

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

JORDAN ECK,	:	
HALEY HARTLINE, and	:	
VINCENT FERRIZZI,	:	
Plaintiffs,	:	
	:	NO. 5:19-cv-01873-MAK
v.	:	
	:	JURY TRIAL DEMANDED
OLEY VALLEY SCHOOL DISTRICT,	:	
et al.	:	
Defendants.	:	FILED ELECTRONICALLY

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Respectfully submitted,

MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN

DATE:

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CERTIFICATE OF SERVICE

I, Sharon M. O'Donnell, Esquire, of Marshall Dennehey Warner Coleman & Goggin, do hereby certify that on this 3rd day of December, 2019, I served a copy of the foregoing Joint Appendix, electronically, as follows:

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT
OF PENNSYLVANIA

* * * * *

JORDAN ECK, HALEY *
HARTLINE, and * Case No.
VINCENT FERRIZZI, * 5:19-CV-1873-MAK
Plaintiffs *
vs. *
OLEY VALLEY SCHOOL *
DISTRICT; TRACY *
SHANK, individually; *
CHRISTOPHER M. *
BAKER, individually; *
and STACY LYONS, *
individually, *
Defendants *

* * * * *

DEPOSITION OF
JORDAN ECK

September 26, 2019

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1	DEPOSITION	1	I N D E X
2	OF	2	
3	JORDAN ECK, taken on behalf of the	3	WITNESS: JORDAN ECK
4	Defendants herein, pursuant to the	4	EXAMINATION
5	Rules of Civil Procedure, taken before	5	By Attorney O'Donnell 7 - 134
6	me, the undersigned, Ian Dale Weeber,	6	EXAMINATION
7	a Court Reporter and Notary Public in	7	By Attorney Ready 134 - 166
8	and for the Commonwealth of	8	DISCUSSION AMONG PARTIES 166 - 167
9	Pennsylvania, at Berks County Bar	9	CERTIFICATE 168
10	Association, 544 Court Street,	10	
11	Reading, Pennsylvania, on Thursday,	11	
12	September 26, 2019 beginning at 2:01	12	
13	p.m.	13	
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1	A P P E A R A N C E S	1	EXHIBIT PAGE
2		2	
3	JOEL A. READY, ESQUIRE	3	
4	Cornerstone Law Firm, LLC	4	NUMBER DESCRIPTION PAGE IDENTIFIED
5	8500 Allentown Pike	5	P-4 School Board 13
6	Suite 3	6	Meeting Minutes 75
7	Blandon, PA 19510	7	P-6 Student Handbook 163
8	COUNSEL FOR PLAINTIFFS	8	P-7 Suspension Letter
9		9	
10	SHARON M. O'DONNELL, ESQUIRE	10	
11	Marshall, Dennehey, Warner, Coleman &	11	
12	Goggin, P.C.	12	
13	100 Corporate Center Drive	13	
14	Suite 201	14	
15	Camp Hill, PA 17011	15	
16	COUNSEL FOR DEFENDANTS	16	
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<p style="text-align: right;">Page 6</p> <p>1 OBJECTION PAGE</p> <p>2</p> <p>3 ATTORNEY PAGE</p> <p>4 Ready 124</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 8</p> <p>1 brought against those Defendants, and</p> <p>2 I'm going to ask you to --- I'm going</p> <p>3 to ask that you comply with the</p> <p>4 following instructions that I'm going</p> <p>5 to give you.</p> <p>6 First is that because this is a</p> <p>7 proceeding that's being transcribed by</p> <p>8 a Court Reporter, you'll need to keep</p> <p>9 your answers audible and verbal. That</p> <p>10 means that you must speak loud enough</p> <p>11 so that we can hear you over the air</p> <p>12 conditioner in this room. And</p> <p>13 verbally, you cannot respond as you're</p> <p>14 doing now, physical gestures. You've</p> <p>15 got to use words. If you need to</p> <p>16 respond in the affirmative, say yes.</p> <p>17 In the negative, say no.</p> <p>18 In the event that you don't</p> <p>19 know an answer that I ask --- to a</p> <p>20 question that I ask, simply tell me</p> <p>21 you don't know. And if for some</p> <p>22 reason you don't recall something that</p> <p>23 you knew and just don't --- as you sit</p> <p>24 here today, can't recall, just say</p> <p>25 that you don't remember.</p>
<p style="text-align: right;">Page 7</p> <p>1 STIPULATION</p> <p>2 -----</p> <p>3 (It is hereby stipulated and agreed by</p> <p>4 and between counsel for the respective</p> <p>5 parties that reading, signing,</p> <p>6 sealing, certification and filing are</p> <p>7 waived.)</p> <p>8 -----</p> <p>9 PROCEEDINGS</p> <p>10 -----</p> <p>11 JORDAN ECK,</p> <p>12 CALLED AS A WITNESS IN THE FOLLOWING</p> <p>13 PROCEEDING, AND HAVING FIRST BEEN DULY</p> <p>14 SWORN, TESTIFIED AND SAID AS FOLLOWS:</p> <p>15 ---</p> <p>16 EXAMINATION</p> <p>17 ---</p> <p>18 BY ATTORNEY O'DONNELL:</p> <p>19 Q. Good afternoon, Mr. Eck. My</p> <p>20 name is Sharon O'Donnell, and I</p> <p>21 represent the Oley Valley School</p> <p>22 District, Dr. Tracy Shank, Christopher</p> <p>23 Becker, and Stacy Lyons.</p> <p>24 I am going to be asking you</p> <p>25 questions about the lawsuit that you</p>	<p style="text-align: right;">Page 9</p> <p>1 Okay?</p> <p>2 A. Okay.</p> <p>3 Q. Can you follow those</p> <p>4 instructions?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. Thank you.</p> <p>7 If for some reason you don't</p> <p>8 understand a question that I ask,</p> <p>9 please don't answer it. Ask me to</p> <p>10 repeat it or rephrase it because if</p> <p>11 you answer a question that I ask, I'm</p> <p>12 going to assume that you both heard</p> <p>13 it, understood it, and that the answer</p> <p>14 that you give me is the answer that</p> <p>15 you mean to give me.</p> <p>16 Do you understand that?</p> <p>17 A. Yes.</p> <p>18 Q. Okay.</p> <p>19 Do --- is there any reason why</p> <p>20 today you would not be able to answer</p> <p>21 my questions truthfully and to the</p> <p>22 best of your knowledge and</p> <p>23 recollection?</p> <p>24 A. No.</p> <p>25 Q. Do you know what the word oath</p>

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<p>1 means? And do you know what it means</p> <p>2 to take an oath to tell the truth?</p> <p>3 A. That I'm not going to lie, and</p> <p>4 that I'm going to tell the truth.</p> <p>5 Q. Okay.</p> <p>6 A. To the best of my knowledge.</p> <p>7 Q. Do you --- do you know what the</p> <p>8 word perjury means?</p> <p>9 A. No.</p> <p>10 Q. For the purposes of today's</p> <p>11 deposition, perjury would mean an</p> <p>12 intent to lie under oath. That's a</p> <p>13 crime, and you could be pursued</p> <p>14 criminally if we do in fact find that</p> <p>15 you're lying here.</p> <p>16 Okay?</p> <p>17 A. Okay.</p> <p>18 Q. Would you state your full name</p> <p>19 for the record, Mr. Eck?</p> <p>20 A. Jordan Parker Eck.</p> <p>21 Q. And what is your current</p> <p>22 address?</p> <p>23 A. 49 Alsace Avenue, Temple,</p> <p>24 Pennsylvania 19560</p> <p>25 Q. Okay.</p>	<p>1 Q. And is that also on Broad</p> <p>2 Street.</p> <p>3 A. Yeah.</p> <p>4 Q. And what's your major at the</p> <p>5 University of the Arts?</p> <p>6 A. I'm an acting major. I believe</p> <p>7 Furness is at the corner of Pine and</p> <p>8 Broad Street to be specific.</p> <p>9 Q. Let's turn to the first exhibit</p> <p>10 in the binder that's before you and if</p> <p>11 you can recognize something there</p> <p>12 called the caption to your name there.</p> <p>13 A. Right here?</p> <p>14 Q. Jordan Eck --- yes, at the top.</p> <p>15 A. Yep.</p> <p>16 Q. Can you tell me why you're</p> <p>17 suing the Oley Valley School District?</p> <p>18 A. I'm suing because my civil</p> <p>19 rights were broken, and because of the</p> <p>20 defamation claim in Mrs. Lyons email.</p> <p>21 Q. Okay.</p> <p>22 Anything else?</p> <p>23 A. (Indicates no).</p> <p>24 Q. Tell me about your civil rights</p> <p>25 being broken.</p>
Page 11	Page 13
<p>1 And do you currently live at</p> <p>2 that address?</p> <p>3 A. Not currently, no. I reside in</p> <p>4 a college campus.</p> <p>5 Q. Okay.</p> <p>6 A. In a dorm.</p> <p>7 Q. What college is that?</p> <p>8 A. University of the Arts.</p> <p>9 Q. Okay.</p> <p>10 And where's that located?</p> <p>11 A. Philadelphia.</p> <p>12 Q. Okay.</p> <p>13 And what's the address there?</p> <p>14 A. It's on Broad Street, Center</p> <p>15 City, Philadelphia.</p> <p>16 Q. Do you happen to have the</p> <p>17 number?</p> <p>18 A. I live in Furness, 2nd Floor,</p> <p>19 211.</p> <p>20 Q. You live in Furness, 2nd Floor,</p> <p>21 211. Is that 211 the number of the</p> <p>22 apartment ---</p> <p>23 A. Yes.</p> <p>24 Q. --- or --- or the dorm?</p> <p>25 A. Yep.</p>	<p>1 A. I spoke up at a School Board</p> <p>2 meeting, and next day I was suspended</p> <p>3 for my speech. And for my actions</p> <p>4 that night.</p> <p>5 Q. Okay</p> <p>6 So let's break that down. I</p> <p>7 was suspended for my speech and for my</p> <p>8 actions that night.</p> <p>9 Okay.</p> <p>10 So tell me a little bit about,</p> <p>11 well were we --- you tell me. Turn to</p> <p>12 the tab marked three, and we'll</p> <p>13 identify that. I'd like you to pass</p> <p>14 this over to the Court Reporter so he</p> <p>15 can mark that as Plaintiff's 4.</p> <p>16</p> <p>17 (Whereupon, Plaintiff's</p> <p>18 Exhibit 4, School Board</p> <p>19 Meeting Minutes, was</p> <p>20 marked for</p> <p>21 identification.)</p> <p>22</p> <p>23 BY ATTORNEY O'DONNELL:</p> <p>24 Q. Okay.</p> <p>25 Do you recognize what this</p>

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<p style="text-align: right;">Page 14</p> <p>1 series of pages represent?</p> <p>2 A. Yes. These are the School</p> <p>3 Board minutes, I think.</p> <p>4 Q. And you — can you identify</p> <p>5 for me and for the record what day the</p> <p>6 School Board meeting was held?</p> <p>7 A. Wednesday, March 20th, 2019 at</p> <p>8 7:00 in the high school library.</p> <p>9 Q. Okay.</p> <p>10 And is your name reflected in</p> <p>11 attendance in the meeting?</p> <p>12 A. Yes, twice. As a guest and as</p> <p>13 a senior student representative to the</p> <p>14 Board.</p> <p>15 Q. And what does it mean to be a</p> <p>16 student — senior student</p> <p>17 representative to the Board?</p> <p>18 A. I do — I report, based on</p> <p>19 what the principals tell me, the — I</p> <p>20 was at a representative as a junior</p> <p>21 and also as a senior. So as a junior,</p> <p>22 I read the Principal's — basically</p> <p>23 updates on the school for the</p> <p>24 elementary and the middle school. And</p> <p>25 then I also read for the high school</p>	<p style="text-align: right;">Page 15</p> <p>1 Q. On behalf of?</p> <p>2 A. As the President of the Drama</p> <p>3 Club. And I talked about how I was</p> <p>4 accused by Mrs. Lyons of a couple</p> <p>5 things, how I had many disagreements</p> <p>6 with Mrs. Lyons artistically, how</p> <p>7 rehearsals were being run, and how she</p> <p>8 sent an email filled with lies about</p> <p>9 me and my mother.</p> <p>10 Q. Can you repeat what you said</p> <p>11 between your artistic disagreements</p> <p>12 with Mrs. Lyons and the email filed</p> <p>13 with lies about you and your mother?</p> <p>14 A. Yes. So I talked about how we</p> <p>15 had disagreements artistically within</p> <p>16 the show, and how she sent an email</p> <p>17 filled with lies about me and my</p> <p>18 mother.</p> <p>19 Q. Okay.</p> <p>20 And did you have any issue with</p> <p>21 Mrs. Lyons with respect to your</p> <p>22 position as President of the Drama</p> <p>23 Club?</p> <p>24 A. Yes I did. So communication</p> <p>25 within — between me and her was not</p>
<p style="text-align: right;">Page 15</p> <p>1 my senior year.</p> <p>2 Q. So it's basically you're</p> <p>3 reading something someone else wrote?</p> <p>4 A. Yeah, I — yeah. I'm supposed</p> <p>5 to represent the student body based on</p> <p>6 what the Principal tells me.</p> <p>7 Q. Just so I'm clear, you never</p> <p>8 voiced an original thought to the</p> <p>9 Board as a senior student</p> <p>10 representative to the Board?</p> <p>11 A. No. I voice my speech</p> <p>12 separately.</p> <p>13 Q. Okay.</p> <p>14 As far as your original</p> <p>15 thoughts being voiced the night of</p> <p>16 March 20th, that would fall under the</p> <p>17 subheading guests?</p> <p>18 A. Yes.</p> <p>19 Q. Okay.</p> <p>20 And can you tell me what you</p> <p>21 said during the School Board meeting?</p> <p>22 A. Yes. I — in the School Board</p> <p>23 meeting in my speech, I talked about</p> <p>24 how I was speaking on behalf of</p> <p>25 President of the Drama Club.</p>	<p style="text-align: right;">Page 17</p> <p>1 well. Rehearsals started late often,</p> <p>2 schedules changed often.</p> <p>3 Q. Okay.</p> <p>4 Anything else?</p> <p>5 A. I disagreed with some of the</p> <p>6 ways she directed us as actors and</p> <p>7 performers.</p> <p>8 Q. So that would be an artistic</p> <p>9 disagreement?</p> <p>10 A. Yes.</p> <p>11 Q. What are your job duties as</p> <p>12 President of the Drama Club? What do</p> <p>13 you do?</p> <p>14 A. I coordinate activities for the</p> <p>15 students. I help up to — I lead</p> <p>16 warm up games, so acting exercises</p> <p>17 within the rehearsals. I was a leader</p> <p>18 to my peers and friends. I</p> <p>19 communicated with people in the club.</p> <p>20 Q. Coordinated schedules did you</p> <p>21 say?</p> <p>22 A. I coordinated theater games and</p> <p>23 different activities with the</p> <p>24 students.</p> <p>25 Q. And when you said you were</p>

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<p>1 leader to your peers and friends, what 2 does that mean? Specifically, what 3 did you do? 4 A. I lead theater games, I helped 5 students with homework occasionally, I 6 helped go over lines, and I 7 occasionally helped students with 8 their choreography. Things of that 9 nature. 10 Q. And how long had you been 11 President of the Drama Club? 12 A. Well, I had been Vice President 13 my sophomore year and my junior year, 14 and I was President of the Drama Club 15 my senior year. I was voted in by the 16 students, all three years. 17 Q. By the club members? 18 A. Yes. 19 Q. Now you said you were accused 20 by Mrs. Lyons of something? 21 A. Yes. So in a meeting with Dr. 22 Shank, I had been told that I was 23 trying to sabotage the musical. And I 24 had also gotten word from Dr. Shank 25 and Dawn Cambria that somebody had</p>	<p>1 And what did Alexa tell you 2 that she said to Mrs. Lyons? 3 A. On the phone, she wouldn't 4 divulge any information because she 5 said it would've be appropriate to do 6 so, but she told Haley that Mrs. Lyons 7 had twisted her words. 8 Q. Haley was just in here and she 9 didn't say that. Why do you think 10 that Mrs. Lyons twisted Haley's words? 11 A. Twisted Alexa's words. 12 Q. Why do you think that Mrs. 13 Lyons twisted Alexa's words? That 14 wasn't Haley's testimony. She didn't 15 tell us that. Why do you think it was 16 true? 17 A. Can you rephrase your question? 18 Q. Sure. Haley was just in here, 19 and she testified about the same 20 thing. She has no idea what Alexa told 21 Mrs. Lyons so how would you know if 22 she twisted Mrs. Lyons words --- Mrs. 23 Lyons twisted Alexa's words? 24 A. Because Mrs. Lyons doesn't like 25 me.</p>
Page 19	Page 21
<p>1 reported that I was abusing Haley by 2 not letting her eat. And I found out 3 that Mrs. Lyons was the one who 4 reported it. 5 Q. Dr. Shank and Dawn Cambria told 6 you that someone had reported that you 7 were abusing Haley by not letting her 8 eat? 9 A. Yes. 10 Q. And how did you find out that 11 Mrs. Lyons reported it? 12 A. Haley told me that she had told 13 Alexa, her friend. And that Alexa 14 told Mrs. Lyons to watch out for Haley 15 because Haley had been losing weight. 16 And after finding it out from Haley, 17 Alexa had --- Mrs. Lyons had twisted 18 Alexa's words apparently. 19 Q. How --- how do you know that 20 Mrs. Lyons twisted Alexa's words? 21 A. I talked to Haley, who talked 22 to Alexa. 23 Q. Did you talk to Alexa? 24 A. At one point I did, yes. 25 Q. Okay.</p>	<p>1 Q. Okay. 2 A. Haley may have just forgotten 3 to tell you that. 4 Q. So what does Mrs. Lyons not 5 likening you have to do with twisting 6 Alexa's words? 7 A. Because it twisting Alexa's 8 words, she sent in a mandatory report. 9 Whenever she thinks something is 10 wrong, she has to report it. Like, 11 something about a student. So she 12 thought I was abusing Haley. She 13 reported that to Dr. Shank. 14 Even though there's --- there's 15 no evidence in me abusing Haley at 16 all. Other than Alexa saying watch 17 out for Haley because she's losing 18 weight. 19 Q. So I understand that that's how 20 you understand it, but its true isn't 21 it, Mr. Eck, that you don't know what 22 Alexa told Mrs. Lyons? 23 A. Not for sure, no. 24 Q. And you don't know what Mrs. 25 Lyons told Dr. Shank, do you?</p>

6 (Pages 18 to 21)

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<p>1 A. I can't because it's a mandated 2 report, and that's pretty 3 confidential. 4 Q. Were you investigated by 5 Children and Youth? 6 A. No. 7 Q. Were you investigated by the 8 police? 9 A. No. 10 Q. Were you investigated by 11 anyone? 12 A. Nope. 13 Q. With respect to the lies that 14 you say are reflected in an email, was 15 that an email that was directed to 16 you? 17 A. It wasn't sent to me, but 18 talked about me and my mother. 19 Q. And how did you get the email 20 that was never sent to you or your 21 mother? 22 A. A student sent a screenshot of 23 it to me on my phone. 24 Q. Who is that student? 25 A. Melissa Geary.</p>	<p>1 happening behind the scenes with a 2 student and his mother. 3 Unfortunately, the situation has 4 escalated to the point that this 5 student posted something against 6 another student and the police were 7 called in. 8 The mother and her son want me 9 fired. And in the mother's words, she 10 is going to destroy me. All of this 11 because her son was not cast as Jack. 12 I have been working closely 13 with Dr. Shank and the administration 14 since January. This parent has made 15 friends with Mrs. Zackon on the School 16 Board. This is helping to fuel the 17 fire. 18 Dr. Shank let me know today 19 that this parent is planning on 20 attending the School Board meeting 21 tomorrow night at 7:00 p.m. in the 22 high school library. I am reaching 23 out to ask any and all parents that 24 believe in this program, and students 25 that love it, to please show up to the</p>
Page 23	Page 25
<p>1 Q. And Melissa, did -- was the 2 email directed to Melissa Geary? 3 A. I believe it was directed to 4 the parents of the -- some students 5 in the show. 6 Q. And do you know if Melissa 7 Geary's parents received that email? 8 A. I do. She texted me saying her 9 mother got the email. 10 Q. And what I'd like you to do is 11 flip to tab number six, about ten 12 pages in. And your attorney has a 13 clean copy so he's going to show you 14 his copy. And I'd like for you to 15 identify for us, please, whether or 16 not this is a copy of the screenshot 17 that was sent to you by Melissa Geary. 18 A. Yep, this is the email. 19 Q. Okay. 20 So let's read it out loud if 21 you would, sir. 22 A. Okay. 23 Hi, I need your help. I spent 24 the last two months shielding the kids 25 from some very horrible stuff</p>	<p>1 Board meeting to show your support. 2 We are in jeopardy of losing this 3 program. 4 Any questions, feel free to 5 call me (610) 621-6588. Thank you, 6 Stacey Lyons, Director Oley Valley 7 High School Drama Department. There's 8 her email and her phone number. 9 Q. So how -- so how do you 10 identify yourself in this email? 11 A. Well only two people were up 12 for the role of Jack, and I was the 13 one not casted Jack so. 14 Q. So by process of elimination, 15 you discerned that this is an email 16 that relates to you and your mother. 17 Right? 18 A. Yes. 19 Q. Okay. 20 So she's talking about some 21 very horrible stuff happening behind 22 the scenes. Do you know that goes -- 23 that horrible stuff was? 24 A. No. 25 Q. You have no idea whatsoever?</p>

7 (Pages 22 to 25)

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<p>1 A. Not of the top of my head.</p> <p>2 Q. No? Okay.</p> <p>3 It says unfortunately the</p> <p>4 situation has escalated to the point</p> <p>5 that this student posted something</p> <p>6 against another student and police</p> <p>7 were called in. Is it, or is it not,</p> <p>8 true that Haley posted a --- a video</p> <p>9 of you demonstrating and expressing,</p> <p>10 making expression using the very fruit</p> <p>11 that Jared Mazeika is highly allergic</p> <p>12 to?</p> <p>13 A. She posted that video, yes.</p> <p>14 Q. And you are depicted in that</p> <p>15 video holding the fruit that Jared</p> <p>16 Mazeika, the boy that was cast as</p> <p>17 Jack, is highly allergic to.</p> <p>18 Isn't that correct?</p> <p>19 A. I was holding fruit, and I</p> <p>20 believe there was something else, but</p> <p>21 I can't remember.</p> <p>22 Q. Did you and Jared have a tense</p> <p>23 relationship after he was cast as</p> <p>24 Jack?</p> <p>25 A. At first, but it went away</p>	<p>1 dedicated to theater and loved the</p> <p>2 show.</p> <p>3 Q. How did you express your</p> <p>4 tension towards him?</p> <p>5 A. Just did the same I guess. We</p> <p>6 just didn't talk.</p> <p>7 Q. But you were the President of</p> <p>8 the drama club, so was it appropriate</p> <p>9 for you not to talk to him?</p> <p>10 A. What do you mean?</p> <p>11 Q. Well I thought you said that</p> <p>12 you're the President of the Drama</p> <p>13 Club, and that one of your</p> <p>14 responsibilities is to talk and start</p> <p>15 games, and do some other things</p> <p>16 communicating with the club members.</p> <p>17 A. Yes.</p> <p>18 Q. And Jared is a club member.</p> <p>19 Correct?</p> <p>20 A. Right, yeah. I mean socially,</p> <p>21 we just didn't talk as much.</p> <p>22 Q. So during practice, did you not</p> <p>23 talk to him?</p> <p>24 A. Every now and then we did when</p> <p>25 it concerned the show. We just didn't</p>
Page 27	Page 29
<p>1 because we talked things out.</p> <p>2 Q. What did he do wrong? What did</p> <p>3 he do against you?</p> <p>4 A. He didn't do anything wrong.</p> <p>5 To me.</p> <p>6 Q. Okay.</p> <p>7 So if he didn't do anything</p> <p>8 wrong to you, then why did you have a</p> <p>9 tense relationship with him?</p> <p>10 A. After auditions, because we</p> <p>11 were competing the same role, of</p> <p>12 course it was a tense relationship.</p> <p>13 That slowly went away as we had to</p> <p>14 work together in the show.</p> <p>15 Q. When you say this --- the tense</p> <p>16 relationship slowly went away, how did</p> <p>17 Jared express the tension towards you?</p> <p>18 A. Often, it was just not talking</p> <p>19 to me. Not --- not being near me.</p> <p>20 Because I was, as you know, like the</p> <p>21 President I was pretty friendly to</p> <p>22 everybody. But often times, you know,</p> <p>23 we just didn't talk as much. And as</p> <p>24 rehearsals kept going, we talked a</p> <p>25 little bit more because we were both</p>	<p>1 really communicate about our personal</p> <p>2 social lives as much.</p> <p>3 Q. Okay.</p> <p>4 And what kind of things did you</p> <p>5 talk about in terms of your personal</p> <p>6 life with Jared before you competed</p> <p>7 for the position as Jack?</p> <p>8 A. We'd often talk about</p> <p>9 theatrical things. We were in West</p> <p>10 Side Story together at EPAC, Ephrata</p> <p>11 Performing Arts Center. And we were</p> <p>12 both jets, and ---.</p> <p>13 Q. We were both jets?</p> <p>14 A. Yeah. Those are characters in</p> <p>15 the show.</p> <p>16 Q. Okay.</p> <p>17 A. So we worked together there.</p> <p>18 We mostly talked over our love of</p> <p>19 theater, and acting and music.</p> <p>20 Q. Are you friends with Mrs.</p> <p>21 Zackon on the School Board?</p> <p>22 A. No.</p> <p>23 Q. Did you ever talk to Mrs.</p> <p>24 Zackon on the School Board?</p> <p>25 Did your mother ever talk to</p>

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<p>1 Mrs. Zackon on the School Board?</p> <p>2 A. Yes.</p> <p>3 Q. And what did your mother have</p> <p>4 to say to Mrs. Zackon?</p> <p>5 A. She was informing her about</p> <p>6 things going on in the drama club.</p> <p>7 Q. Okay.</p> <p>8 And with the intention of doing</p> <p>9 what?</p> <p>10 A. To keep her informed because of</p> <p>11 how rehearsal was being run poorly by</p> <p>12 Mrs. Lyons.</p> <p>13 Q. And what did she think Mrs.</p> <p>14 Zackon was going to do being on the</p> <p>15 School Board?</p> <p>16 A. Report it to the rest of the</p> <p>17 School Board members.</p> <p>18 Q. And what did she think the</p> <p>19 entire School Board was going to do</p> <p>20 about Mrs. Lyons' rehearsals or</p> <p>21 running of the drama club?</p> <p>22 A. Supervise her, give her more</p> <p>23 training, change something with how</p> <p>24 they were being run so that they could</p> <p>25 be run more effectively and</p>	<p>1 acquaintances on the School Board?</p> <p>2 A. No.</p> <p>3 Q. So in the last paragraph, she</p> <p>4 states I'm reaching out to ask any and</p> <p>5 all parents that believe in this</p> <p>6 program and students that love the</p> <p>7 program to please show up to the Board</p> <p>8 meeting to --- to show your support.</p> <p>9 She doesn't say your support of me.</p> <p>10 Right?</p> <p>11 A. Uh-huh (yes).</p> <p>12 Q. Is that correct?</p> <p>13 You have to answer audibly.</p> <p>14 A. That's correct. That's</p> <p>15 correct.</p> <p>16 Q. Okay.</p> <p>17 Why then do you think that Mrs.</p> <p>18 Lyons was --- was trying to avoid</p> <p>19 having any comment made directly</p> <p>20 against her?</p> <p>21 A. So that it would seem like the</p> <p>22 students --- so that it would seem</p> <p>23 that I was trying to get rid of the</p> <p>24 program instead of correcting Mrs.</p> <p>25 Lyons' actions so that the students</p>
Page 31	Page 33
<p>1 artistically.</p> <p>2 Q. What does the School Board have</p> <p>3 to do with the drama club?</p> <p>4 A. The School Board oversees</p> <p>5 activities in the school.</p> <p>6 Q. No. The School Board oversees</p> <p>7 the Superintendent. Period. They</p> <p>8 have one employee. That's the</p> <p>9 Superintendent. Why did your mother</p> <p>10 go to Mrs. Zackon on the School Board?</p> <p>11 One person out of nine.</p> <p>12 A. Because the School Board speaks</p> <p>13 to Dr. Shank, and she also runs</p> <p>14 activities in the school.</p> <p>15 Q. Did your mother intend to</p> <p>16 create problems for Mrs. Lyons by</p> <p>17 talking to a single member of the</p> <p>18 School Board?</p> <p>19 A. Not problems. Just corrections</p> <p>20 within the club.</p> <p>21 Q. Is your mother friends with</p> <p>22 Mrs. Zackon?</p> <p>23 A. I guess, acquaintances.</p> <p>24 They're acquaintances.</p> <p>25 Q. Does she have any other</p>	<p>1 would be in favor of speaking towards</p> <p>2 her.</p> <p>3 Q. Were there any people that</p> <p>4 showed up at the School Board meeting</p> <p>5 to speak in favor of Mrs. Lyons?</p> <p>6 A. Yes.</p> <p>7 Q. Okay.</p> <p>8 Now at any time --- who ---</p> <p>9 before the --- the School Board</p> <p>10 meeting, where were you?</p> <p>11 A. Before the School Board</p> <p>12 meeting?</p> <p>13 Q. Yes.</p> <p>14 A. I was at Mrs. Ferrizzi's house.</p> <p>15 So --- so the Ferrizzi's house and</p> <p>16 also my house.</p> <p>17 Q. Okay.</p> <p>18 Did you go to school that day?</p> <p>19 A. Yes.</p> <p>20 Q. Okay.</p> <p>21 And what time did you leave?</p> <p>22 A. I can't remember.</p> <p>23 Q. Did you stay the whole day?</p> <p>24 A. I don't think so.</p> <p>25 Q. Why not?</p>

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<p>1 A. Because I was really, like, 2 stressed out. 3 Q. Why were you really stressed 4 out? 5 A. I believe that was the same day 6 as when I found out about the fruit 7 video. And I wanted to talk to 8 somebody, and nobody was there to talk 9 to. 10 Q. Okay. 11 Did you go back to class? 12 A. No. They excused me --- I --- 13 I can't remember. They didn't excuse 14 me. I can't remember. 15 Q. Did you just walk out of 16 school? 17 A. I am on work release for school 18 which means I'm ahead on my credits. 19 So in the middle portion of the day, 20 around 11:15, I can go to work at the 21 Glick's Greenhouse, but I wasn't 22 feeling well. And so, I called my 23 boss and he let me out of work. 24 Q. So do you think you left school 25 in the morning or in the afternoon</p>	<p>1 Q. Yes? 2 A. Yes. Yes. 3 Q. And you weren't feeling well 4 because Dr. Shank talked to you about 5 the video, someone talked to you about 6 the video regarding Jared Mazeika. 7 Correct? 8 A. No, I just found out about --- 9 that was the day I found out about the 10 email and what that video was. 11 Because I didn't know --- the day 12 before, they talked to me about 13 there's some Snapchat video going 14 around and you could be involved. And 15 I'm like, I don't know what you're 16 talking about. And then the day in 17 anatomy class, I got the screenshot 18 from Misses --- from Melissa Geary and 19 then I went down to the office. 20 I remember now. I went to my 21 literature class, and I told the 22 teacher I wasn't feeling well. Then I 23 went to the office to talk to 24 somebody, and I couldn't talk to 25 anybody. And all my way into the</p>
Page 35	Page 37
<p>1 when you were leaving for work 2 release? 3 A. It would be slightly before 4 12:00. 5 Q. And so, you were leaving at 6 your normal time then? That --- 7 pursuant to your schedule --- 8 A. I think so. 9 Q. --- because you'd be going to 10 work. 11 Is that correct? 12 A. Yeah. 13 Q. So you didn't really leave 14 early, you would be leaving at your 15 normal time according to your 16 testimony. 17 Right? 18 A. Yes. 19 Q. Okay. 20 But you called your boss as 21 Glick's Greenhouse and you called off 22 of work because you weren't feeling 23 well. 24 Right? 25 A. Uh-huh (yes).</p>	<p>1 hallway --- in the hallway, Julia Ulsh 2 and Vinny had told me what the video 3 was, that it was the fruit video that 4 I was making jokes in. 5 Q. Right. 6 A. And then I was even more not 7 feeling well. And I wanted to speak 8 to somebody about it, but --- 9 Q. Let me stop you there. Why 10 would you be upset that that, the 11 fruit video that your girlfriend 12 posted, had made its way around 13 school? 14 A. I was upset that Jared was 15 offended by it because it didn't have 16 anything to do with him. 17 Q. Those were the fruits though 18 that could be deadly to him. 19 Right? 20 A. I think so. 21 Q. And you were his competition in 22 the --- in a play. 23 Right? 24 A. In auditions. 25 Q. In auditions.</p>

10 (Pages 34 to 37)

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<p>1 Right?</p> <p>2 A. For the musical, yeah.</p> <p>3 Q. Okay.</p> <p>4 And you had a tense</p> <p>5 relationship after he was cast as</p> <p>6 Jack.</p> <p>7 Right?</p> <p>8 A. In the beginning.</p> <p>9 Q. So would it be unreasonable to</p> <p>10 him to feel a little intimidated when</p> <p>11 you're on a video posted for the</p> <p>12 entire school to see with the fruit</p> <p>13 that, really, could be fatal to him?</p> <p>14 A. It wasn't for the entire school</p> <p>15 to see. It was only for Haley's</p> <p>16 friends on Snapchat.</p> <p>17 Q. Only for Haley's friends on</p> <p>18 Snapchat.</p> <p>19 A. It's for her public snapchat</p> <p>20 story. But that's not to say somebody</p> <p>21 couldn't have taken their phone and</p> <p>22 shown somebody.</p> <p>23 Q. Well someone showed Jared.</p> <p>24 Right?</p> <p>25 A. I suppose.</p>	<p>1 Q. Well why didn't you tell him</p> <p>2 that?</p> <p>3 A. I didn't have time to talk to</p> <p>4 him.</p> <p>5 Q. But you were looking for</p> <p>6 someone to talk about --- talk with in</p> <p>7 the office. Why didn't you just talk</p> <p>8 with him?</p> <p>9 A. He had a class.</p> <p>10 Q. Why didn't you call him later</p> <p>11 that day, or send him a text and say</p> <p>12 hey man, no offense?</p> <p>13 A. I didn't.</p> <p>14 Q. Why not?</p> <p>15 A. I didn't want to try and make</p> <p>16 things worse.</p> <p>17 Q. How would an apology make</p> <p>18 things worse?</p> <p>19 A. I don't know.</p> <p>20 Q. Okay.</p> <p>21 So you find out that this video</p> <p>22 is circulating through Haley's public</p> <p>23 Snapchat forum, and Jared now sees it</p> <p>24 and he's offended. Plus you found out</p> <p>25 about this email, and you were upset?</p>
Page 39	Page 41
<p>1 Q. As a matter of fact, he's</p> <p>2 actually friends with Haley on</p> <p>3 Snapchat.</p> <p>4 Right?</p> <p>5 A. Uh-huh (yes).</p> <p>6 Q. Yes?</p> <p>7 A. I think so.</p> <p>8 Q. Okay.</p> <p>9 So posting that video for Jared</p> <p>10 to see could be a direct --- a front,</p> <p>11 to him because of the serious allergy</p> <p>12 he has to those fruits?</p> <p>13 A. But it wasn't.</p> <p>14 Q. So if it wasn't, and you're</p> <p>15 smiling about it because you feel like</p> <p>16 it absolutely was not, then why were</p> <p>17 you upset?</p> <p>18 A. Because I was shocked that he</p> <p>19 was offended by it because it had</p> <p>20 nothing to do with him.</p> <p>21 Q. Well did you apologize to him?</p> <p>22 A. No.</p> <p>23 Q. Why not?</p> <p>24 A. Because it wasn't directed</p> <p>25 towards him.</p>	<p>1 A. Yes.</p> <p>2 Q. And then you were looking for</p> <p>3 someone in the office to talk to. Who</p> <p>4 exactly were you looking to speak</p> <p>5 with?</p> <p>6 A. Mr. Becker, Dr. Shank.</p> <p>7 Guidance counselor.</p> <p>8 Q. What would you talk to them</p> <p>9 about? What would you say?</p> <p>10 A. Why is this going around, were</p> <p>11 the police actually called on me?</p> <p>12 Because I didn't talk to anybody. I</p> <p>13 didn't know what I did wrong, and I</p> <p>14 would like --- I wanted something ---</p> <p>15 I wanted some comfort because ---.</p> <p>16 Q. Do --- do you know if Jared and</p> <p>17 Mrs. Mazeika, his mother, had any</p> <p>18 comfort when they saw that video?</p> <p>19 A. I don't know their reaction to</p> <p>20 the video.</p> <p>21 Q. And would you know whether or</p> <p>22 not they spoke with Dr. Shank about</p> <p>23 feeling threatened by that video?</p> <p>24 A. I don't know.</p> <p>25 Q. Do you know whether or not they</p>

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<p>1 spoke to anyone about feeling so 2 threatened that they needed to call 3 the police? 4 A. Yes. 5 Q. And do you know whether or not 6 they actually did call the police? 7 A. I don't. 8 Q. Okay. 9 No one though spoke to you from 10 the Police Department. 11 I that correct? 12 A. Nobody. 13 Q. And no one spoke to you from 14 Children and Youth. 15 Is that correct? 16 A. That's correct. 17 Q. Okay. 18 So you finish -- well I guess 19 I should've asked another one. And 20 let's go to page 5. And at the top of 21 page 5, you'll see a paragraph marked 22 25. And it begins, on the evening of 23 March 20th, during the regularly 24 scheduled rehearsal for the school 25 show, Mrs. Lyons dismissed students to</p>	<p>1 Q. Okay. 2 Who helped you write the 3 speech? 4 A. My mom, Mrs. Ferrizzi, Mr. 5 Ferrizzi, Haley, Vinny. 6 Q. They all helped --- they all 7 contributed to your speech? 8 A. They not --- they didn't 9 contribute. I wrote my speech, and we 10 read them out loud to each other to 11 make sure they were solid. 12 Q. Did anyone change any of the 13 language that you used? 14 A. No. 15 Q. So then you went home to print 16 out your speech, and then you went 17 directly to the School Board meeting? 18 A. That's correct. 19 Q. So you wouldn't know whether or 20 not Mrs. Lyons dismissed students or 21 not from rehearsal because you weren't 22 there. 23 Right? 24 A. I was at the meet -- the 25 School Board meeting when students who</p>
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<p>1 speak positively on her behalf at the 2 School Board meeting. 3 How do you know that? 4 A. That's what happened. 5 Q. How do you know? 6 A. When I was at the School Board 7 meeting, students walked in. They all 8 filled out --- most of them filled out 9 cards to speak at the School Board 10 meeting, and they spoke to Mrs. Lyons' 11 character in a positive way on the 12 stand. 13 Q. Okay. 14 So it says during the regularly 15 scheduled rehearsal for the school 16 show. Were you there? 17 A. I did not go to rehearsal. I 18 went to the meeting instead. 19 Q. Okay. 20 You went directly from the 21 Ferrizzi's house to the School Board 22 meeting? 23 A. I went to the Ferrizzi's house, 24 and I think I went back to my house to 25 print out my speech.</p>	<p>1 were at the rehearsal walked into the 2 School Board meeting. 3 Q. Okay. 4 That's a different answer to a 5 different question. I'm simply asking 6 whether you were present for rehearsal 7 when Mrs. Lyons dismissed anyone. 8 A. I wasn't present for that 9 rehearsal, no. 10 Q. So you don't know if she 11 actually did that or not? 12 A. I don't know because I wasn't 13 there. 14 Q. Perfect. It says, Mrs. Lyons 15 dismissed students to speak positively 16 on her behalf. How do you know that? 17 A. Students spoke positively on 18 her behalf at the School Board 19 meeting. 20 Q. Okay. 21 Do you know --- how --- how do 22 you know Mrs. Lyons dismissed them to 23 be able to do that? 24 A. Well they left rehearsal, and 25 they were at the Board meeting.</p>

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<p>1 Q. Do you think Mrs. Lyons only 2 dismissed them to speak positively on 3 her behalf? 4 A. I think she dismissed them to 5 speak at the School Board meeting. 6 Q. Do you have any evidence --- 7 and I'm going to use that term very 8 loosely and not in a legal sense, that 9 Mrs. Lyons dismissed the students only 10 to speak positively on her behalf? 11 A. I have witnesses at the 12 rehearsal. I don't know if that's 13 evidence or ---. 14 Q. So someone who is --- who is at 15 the rehearsal and was dismissed by 16 Mrs. Lyons said to you that Misses --- 17 Mrs. Lyons dismissed us from rehearsal 18 so that we can go to the School Board 19 and speak positively on her behalf? 20 A. I think because of the email 21 students left, hoping to speak at the 22 School Board meeting because based on 23 her email, they thought that I was 24 trying to get rid of the club. So 25 they were speaking for the club ---</p>	<p>1 A. What does disparage mean? 2 Q. Were you trying to paint her in 3 a negative light to the School Board? 4 A. I was trying to paint her 5 actions in a negative light. 6 Q. In paragraph 27, it says the 7 School Board announced at the outset 8 that it would not allow any character 9 assassination of Mrs. Lyons, and that 10 only positive comments about her and 11 her character would be tolerated. 12 Do you see that? 13 A. Yes. 14 Q. Okay. 15 Was it the entire School Board? 16 A. Mr. Pollock. I believe the 17 President and whoever the attorney was 18 for the School Board there. 19 Q. And are you absolutely sure it 20 was Mr. Pollock? 21 A. Yes. 22 Q. Okay. 23 And do you recognize Mr. 24 Pollock? 25 A. Yes.</p>
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<p>1 Q. All right. 2 A. --- about the situation. And 3 if, for the students, if that takes 4 speaking positively about Mrs. Lyons 5 to keep the club, then I think that's 6 what they would do. 7 Q. Now it says in paragraph 26 at 8 this meeting, three students, Jordan, 9 Haley, and Vinny, along with several 10 parents and alumni spoke against Mrs. 11 Lyons. 12 When you say spoke against Mrs. 13 Lyons, is it anything beyond what 14 we've already discussed in terms of 15 what you said at the School Board 16 meeting? 17 A. No. 18 Q. What makes you think that 19 disagreeing with her artistically is 20 speaking against her? 21 A. Because I was speaking at the 22 School Board meeting against her 23 ideals and how she runs rehearsals. 24 Q. Were you trying to disparage 25 her to the School Board?</p>	<p>1 Q. Okay. 2 And he is the President? 3 A. I think so. He sat at the head 4 of the table. 5 Q. Okay. 6 And then, the attorney. Do you 7 know the attorney? 8 A. No. 9 Q. And did the attorney speak? 10 A. Yes. 11 Q. What did the attorney said? 12 A. There would not be any 13 character assassination of Mrs. Lyons. 14 Q. And do you know the name of the 15 attorney? 16 A. No. 17 Q. And how do you know it was an 18 attorney? 19 A. I think it said ESQ on his name 20 tag. 21 Q. Okay. 22 Was that advice heeded, as in 23 H-E-E-D-E-D, heeded? Heeded, or did 24 you ignore that advice? 25 A. That advice was heeded. I</p>

13 (Pages 46 to 49)

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<p>1 never said Mrs. Lyons' name in my 2 speech. I replaced it in the writing 3 with the people running rehearsals or 4 the people up top, the directors. 5 That's what I said in my speech. 6 Q. In 28, you said the School 7 Board also announced that no one could 8 be referred to by name even though the 9 School Board knew at that time that 10 some students, parents, and alumni, 11 and had come specifically to regard 12 --- to speak regarding Mrs. Lyons 13 behavior. 14 Is that true? 15 A. That's true. 16 Q. And how did the School Board 17 know in advance? 18 A. Well, we're all drama students, 19 and they came in to speak. 20 Q. Did anyone tell any --- did 21 someone tell anyone on the Board 22 before the Board meeting that students 23 --- drama students, would be coming in 24 to speak out against Mrs. Lyons? 25 A. My mother called Mr. Pollock</p>	<p>1 all the students wanted the program to 2 continue, as did I. And that if they 3 thought that I was being a bad person 4 based upon an email, they would fight 5 for the club to stay alive. 6 Q. In paragraph 29, it says 7 accordingly Jordan, Haley, and Vinny 8 along with other --- all others who 9 spoke against Mrs. Lyons were severely 10 curtailed in their ability to speak 11 their viewpoints about the situation 12 as it had developed in regards to the 13 school show. 14 Do you know what curtailed 15 means? 16 A. Hindered. 17 Q. Okay. 18 So how was your speech severely 19 hindered? 20 A. They kept, not for me because I 21 didn't say Mrs. Lyons name, but for 22 other people who spoke --- spoke 23 against Mrs. Lyons, they would 24 interrupt whenever her name would be 25 said in speech saying there will be no</p>
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<p>1 and said that we would be speaking at 2 the Board meeting, but I don't think 3 Mr. Pollock knew that students from 4 the drama club would be dismissed to 5 speak about Mrs. Lyons in a positive 6 way. 7 Q. So he knew that you were coming 8 in to speak negatively about Mrs. 9 Lyons, but he didn't know that drama 10 club students had been dismissed to 11 speak about Mrs. Lyons positively, or 12 negatively? 13 A. I don't know exactly everything 14 he knew, but I know that my mother 15 talked to him and said that we were 16 coming to express our concerns with 17 Mrs. Lyons' actions taken during 18 rehearsals for Newsies. I don't know 19 whether or not he knew that Mrs. Lyons 20 would dismiss the drama students. 21 Q. And again, you don't know if 22 Mrs. Lyons knew what the drama 23 students were going to say for or 24 against the program? 25 A. I think Mrs. Lyons knew that</p>	<p>1 character assassinations. 2 Q. Are you aware that speech can 3 be limited or restricted in certain 4 ways? 5 A. No. 6 Q. Are you saying no, you don't 7 know, or no, that's not true? 8 A. No, I do not know. 9 Q. So what did you do after the 10 School Board meeting? 11 A. After the School Board meeting, 12 I had shaken hands with some of the 13 School Board members. Dr. Markley had 14 told me to go back to rehearsal with 15 my head up. I even spoke to Mrs. 16 Mazeika, that was Jared's mom, and I 17 --- I hugged her and I said, you know 18 whatever happened, I --- I want Jared 19 to feel better, I want things to get 20 worked out, and I'm looking forward to 21 moving on with the show. And she 22 agreed. 23 Q. Did she thank you for saying 24 that? 25 A. I can't remember. It was very</p>

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<p>1 positive, seemingly, moving forward</p> <p>2 type conversation.</p> <p>3 Q. Were you late for rehearsal</p> <p>4 coming back?</p> <p>5 A. Yes, because rehearsal started</p> <p>6 at the same time, around the same time</p> <p>7 as the School Board meeting.</p> <p>8 Q. Right, but some of the students</p> <p>9 had been dismissed to go to the</p> <p>10 meeting if they chose to go.</p> <p>11 Correct?</p> <p>12 A. Right, yeah. So after the</p> <p>13 meeting, they went back. And then I</p> <p>14 hung around a little longer than they</p> <p>15 did. And I shook hands, I was talking</p> <p>16 to Mrs. Mazeika, and then I eventually</p> <p>17 went back to the rehearsal.</p> <p>18 Q. Where was Haley at this time?</p> <p>19 A. In the hallway, maybe at</p> <p>20 rehearsal.</p> <p>21 Q. You don't remember?</p> <p>22 A. I don't remember.</p> <p>23 Q. When you got to rehearsal, was</p> <p>24 the door open or locked?</p> <p>25 A. The side door was open, and I</p>	<p>1 I'm assuming they were what did they</p> <p>2 say? How do you guys feel about this?</p> <p>3 Q. Well try not to guess if you</p> <p>4 don't know.</p> <p>5 A. Okay.</p> <p>6 Q. It says after rehearsal</p> <p>7 concluded, Jordan addressed the other</p> <p>8 students at that time and said he</p> <p>9 hoped everyone could move on together</p> <p>10 and have a great show.</p> <p>11 Is that true?</p> <p>12 A. Yep.</p> <p>13 Q. Okay.</p> <p>14 And why did you do that?</p> <p>15 A. Well after the meeting, I was</p> <p>16 ready to move on and I was encouraging</p> <p>17 other students. I was really proud of</p> <p>18 everybody for speaking up, and I</p> <p>19 expressed that. And I said I was</p> <p>20 excited to move on with them at the</p> <p>21 show for the good of theater.</p> <p>22 Q. Under Mrs. Lyons' direction?</p> <p>23 A. Yes.</p> <p>24 Q. Did anyone tell you that Mrs.</p> <p>25 Lyons would be dealt with in some way?</p>
Page 55	Page 57
<p>1 went in and I got up on stage and</p> <p>2 danced.</p> <p>3 Q. Did you go in through the side</p> <p>4 door or did you try the front door?</p> <p>5 A. No, I usually enter through the</p> <p>6 side door.</p> <p>7 Q. Okay.</p> <p>8 So the front door wasn't even</p> <p>9 an issue for you?</p> <p>10 A. I didn't see.</p> <p>11 Q. It says Mrs. Lyons went around</p> <p>12 the room asking the students to share</p> <p>13 what they had said, and also to share</p> <p>14 what Jordan, Haley, and Vinny had said</p> <p>15 against her.</p> <p>16 Were you there when that</p> <p>17 happened?</p> <p>18 A. No.</p> <p>19 Q. It says that she asked direct</p> <p>20 and pointed questions about the</p> <p>21 statements of students who opposed her</p> <p>22 at the School Board meeting.</p> <p>23 What were those direct and</p> <p>24 pointed questions?</p> <p>25 A. I wasn't there, I don't know.</p>	<p>1 A. No.</p> <p>2 Q. Do you know whether or not Mrs.</p> <p>3 Lyons was dealt with in some way?</p> <p>4 A. I do not know.</p> <p>5 Q. If she was, would that be any</p> <p>6 of your business?</p> <p>7 A. I don't know.</p> <p>8 Q. It says after Jordan spoke to</p> <p>9 the other students, Jordan went to</p> <p>10 Mrs. Lyons privately and asked to</p> <p>11 speak with her.</p> <p>12 Is that true?</p> <p>13 A. Yes. In between dance numbers,</p> <p>14 right as we were switching to run</p> <p>15 another number, I --- I asked her if I</p> <p>16 could speak with her in the hallway.</p> <p>17 Q. Okay.</p> <p>18 And then it says Mrs. Lyons</p> <p>19 claimed to be uncomfortable speaking</p> <p>20 with him privately, asked the school</p> <p>21 secretary who was still present, Ms.</p> <p>22 Maria Jones, along with Ms.</p> <p>23 Hartenstine, an assistant staff member</p> <p>24 with the school show, to step out into</p> <p>25 the hallway with Mrs. Lyons to be</p>

15 (Pages 54 to 57)

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<p>1 present as she and Jordan spoke about 2 their disagreements. 3 Is that true? 4 A. Yeah. 5 Q. This is paragraph 38 on page 6. 6 A. Yeah, sorry. The fan's blowing 7 the pages. Yes. 8 Q. So it says Mrs. Lyons claimed 9 to be uncomfortable with speaking to 10 him privately. To whom did she 11 express her discomfort? 12 A. Abby. I don't know exactly, 13 but presumably Abby or Mrs. Jones. 14 Q. Okay. 15 So again, I'm going to ask you 16 to only testify to what you know and 17 not something that you're presuming or 18 guessing. 19 A. Yes. 20 Q. So claiming to be uncomfortable 21 with speaking with him privately, do 22 you know if she actually did that, and 23 to whom she said that? 24 A. Not off the top of my head, no. 25 Q. Okay.</p>	<p>1 Right? 2 A. Yes. 3 Q. Now it said to speak about 4 their disagreements. Did Mrs. Lyons 5 know what she was going to be speaking 6 to you about before you got out in the 7 hallway? 8 A. No. 9 Q. So is it true that Mrs. Lyons 10 asked Ms. Hartenstine to accompany her 11 in the hallway to be present as you 12 and she were to speak about your 13 disagreements? 14 A. Yes, she --- can you ask the 15 question again, please? 16 Q. Sure. Is it true that Ms. 17 Lyons asked Ms. Hartenstine to be 18 present while she and you spoke about 19 your disagreements? 20 A. Yes. 21 Q. Ahead of time? 22 A. Yes, before --- Vinny and I 23 were going to go out and talk to them 24 together, and that at that time, Mrs. 25 Lyons said Abby, can you come with me?</p>
Page 59	Page 61
<p>1 It said asked the school 2 secretary who was still present, Ms. 3 Maria Jones, along with Ms. 4 Hartenstine, and an assistant staff 5 member with the school show. An 6 assistant staff member with the school 7 show to step out into the hallway. So 8 first of all, did you see her ask Ms. 9 Maria Jones to come out with her while 10 she spoke with you? 11 A. No. 12 Q. Did you see her or hear her ask 13 Ms. Hartenstine to be present while 14 she spoke with you in the hallway? 15 A. Yes. 16 Q. Yes. And is it true that Ms. 17 Hartenstine is an assistant staff 18 member with the school show? 19 A. Yes. 20 Q. What does that mean? What's 21 her position there? 22 A. She's the assistant director, 23 she helps Mrs. Lyons in the booth. 24 Q. And she's also a teacher in 5th 25 --- in 5th grade.</p>	<p>1 They went out together and I went out 2 with Vinny and she said I'd like to 3 speak with each of you separately. 4 And then, I said okay so I stepped 5 back. 6 So she said alone, please. And 7 I said okay, and then she said so go 8 away. And I went back into the 9 auditorium. And then, by the time 10 Vinny got back, I went out into the 11 hallway to speak with them. 12 Q. Okay. 13 That's an answer to a different 14 question. I'm trying to learn from 15 you whether or not Mrs. Lyons knew 16 that she'd be speaking to you about 17 disagreements before you got out 18 there. 19 A. No. 20 Q. Then it says, once in the 21 hallway and still in plain view of 22 students leaving the rehearsal, Jordan 23 expressed his desire to find a way to 24 patch things over so that he and Mrs. 25 Lyons could productively work together</p>

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<p>1 for the duration of the rehearsals and 2 the final program. 3 And it says plain view of 4 students. Now who were the students 5 that you were in plain view of? 6 A. Well my --- Haley was at the 7 end of the hallway, Vinny was also 8 --- he was heading out, and I --- I 9 don't know exactly who the students 10 were leaving at the end of the 11 hallway. My parents were also at the 12 end of the hallway and so was Ray 13 Forsyth. Now he's not a student, he's 14 an alumni. 15 Q. Would you agree with me though, 16 none of those people could hear what 17 you were saying to Mrs. Lyons? 18 A. No. I --- I do agree with you 19 they would not hear. 20 Q. Okay. 21 It says Jordan expressed his 22 desire to find a way to patch things 23 over with Mrs. Lyons. What did you 24 say to her? 25 A. I said how I'm ready to move on</p>	<p>1 A. No. 2 Q. Do you know if Vinny told her 3 that he was going to be speaking about 4 her in a negative light? 5 A. I don't think he told her that. 6 Q. Do you think Haley told her? 7 A. No. 8 Q. Do you think any of your cast 9 told her? 10 A. They didn't tell Mrs. Lyons. 11 Q. Do you know whether or not Mrs. 12 Zackon told her? 13 A. Nope. 14 Q. So she was basically surprised? 15 A. I think she knew. 16 Q. How would she know? 17 A. I think somebody else told her, 18 like Dr. Shank. Or Mr. Pollock 19 because my mother had spoken to Mr. 20 Pollock. 21 Q. Your mother spoke to Mr. 22 Pollock, too? 23 A. Yeah, on the phone. 24 Q. And when did she speak to Mr. 25 Pollock?</p>
Page 63	Page 65
<p>1 with the show. I talked about how, 2 like these are problems that I really 3 want to be worked out, that they're 4 still happening. Like rehearsals not 5 starting on time, schedules being 6 changed, people showing up late 7 because rehearsals start late. 8 And then she said, well they 9 start late because, excuse me. 10 Because people show up late. And I 11 said no, it's because we start late 12 consistently. Oftentimes, we kept 13 saying like we'll have to agree to 14 disagree. We'll have to agree to 15 disagree. 16 And it seemed like we would 17 move on with the show, and do what's 18 best for the program. 19 Q. Did she know ahead of time that 20 you were going to make a presentation 21 to the Board about her running the 22 drama club to your dissatisfaction? 23 A. I don't know. 24 Q. You didn't tell her. 25 Right?</p>	<p>1 A. Before the School Board 2 meeting. 3 Q. That day? 4 A. I don't know for sure. Before 5 the School Board meeting. 6 Q. So she spoke with Miss --- Ms. 7 Zackon and Mr. Pollock ahead of the 8 School Board meeting to tell them that 9 all of you would be speaking out 10 against Stacy Lyons and the way she 11 runs the drama club program at a 12 public School Board meeting? 13 Is that true? 14 A. Yes. 15 Q. And then you assumed that Dr. 16 Shank knew because of that? 17 A. Yes. 18 Q. And you assumed that Dr. Shank 19 told Mrs. Lyons ahead of this meeting? 20 A. I think --- I don't know. 21 Q. And based on the email that 22 we've read, Mrs. Lyons knew something 23 was going to happen. 24 Right? And she said she was 25 working with Dr. Shank.</p>

17 (Pages 62 to 65)

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<p>1 A. Yes.</p> <p>2 Q. Right? Now do you know whether</p> <p>3 Dr. Shank spoke with any of your</p> <p>4 parents before the School Board</p> <p>5 meeting?</p> <p>6 A. Not my parents, no.</p> <p>7 Q. With anyone's parents?</p> <p>8 A. I don't know.</p> <p>9 Q. Okay.</p> <p>10 It says during this</p> <p>11 conversation, although Mrs. Lyons and</p> <p>12 Ms. Hartenstine occasionally raised</p> <p>13 their voices at Jordan, at no time did</p> <p>14 any of the individuals in this</p> <p>15 conversation make aggressive moves</p> <p>16 towards each other.</p> <p>17 Now why would you say that?</p> <p>18 A. The next day when I was</p> <p>19 suspended, they had told me --- Dr.</p> <p>20 Shank had told me that I had gotten in</p> <p>21 Mrs. Lyons and Abby's face, and that I</p> <p>22 lunged at them.</p> <p>23 Q. Is it possible that --- you</p> <p>24 called her Abby?</p> <p>25 A. Uh-huh (yes).</p>	<p>1 somebody that fast.</p> <p>2 And it's not the same here, and</p> <p>3 I was disappointed in that they</p> <p>4 expected Jared and I, as we talked</p> <p>5 about earlier with the tension slowly</p> <p>6 going away, they expected that to go</p> <p>7 away faster than it did. And I was</p> <p>8 confused by that. And so I asked Abby</p> <p>9 about that.</p> <p>10 Q. Were you, in a sense, in sort</p> <p>11 of an emotional state when you asked</p> <p>12 Abby that?</p> <p>13 A. Yeah.</p> <p>14 Q. Yes?</p> <p>15 A. Yes.</p> <p>16 Q. So describe for me how you</p> <p>17 felt.</p> <p>18 A. I was tired, especially because</p> <p>19 it was a late night with the School</p> <p>20 Board meeting. And I was ready for,</p> <p>21 you know, to move on.</p> <p>22 Q. So why --- if you were ready to</p> <p>23 move on, why were you --- why were you</p> <p>24 confronting Abby about how she felt</p> <p>25 about her feelings not being the same</p>
Page 67	Page 69
<p>1 Q. Is that --- you're allowed to</p> <p>2 call her Abby, not Ms. Hartenstine?</p> <p>3 A. Yes, we call her Abby in</p> <p>4 rehearsals and ---.</p> <p>5 Q. So what did you say to Misses</p> <p>6 --- to Ms. Hartenstine that could be</p> <p>7 construed as getting into her face?</p> <p>8 A. I don't know.</p> <p>9 Q. Is it true that you brought up</p> <p>10 a situation that occurred in 2009</p> <p>11 where she was not cast as lead in the</p> <p>12 play and felt bad about it?</p> <p>13 A. That's true.</p> <p>14 Q. And why did you bring that up?</p> <p>15 A. She talked about, at one of the</p> <p>16 first rehearsals, how she felt better</p> <p>17 right away and that she was friends</p> <p>18 right away with the person who did get</p> <p>19 the lead. And I told her that I was</p> <p>20 very confused by that, and that it</p> <p>21 wasn't as easy for me to reconnect</p> <p>22 with Jared.</p> <p>23 And so, I was questioning her</p> <p>24 about like it's just --- it's crazy</p> <p>25 how, like you can make up with</p>	<p>1 as your feelings? Why did it matter</p> <p>2 if you understood that in the moment,</p> <p>3 and why would you be confused?</p> <p>4 A. Well to work through, you know,</p> <p>5 some of the problems I had was that it</p> <p>6 seemed like, especially during that</p> <p>7 lecture when they talked about it,</p> <p>8 that I had to just get over it right</p> <p>9 away. And that was one of the</p> <p>10 problems that I had, and I --- I</p> <p>11 wanted to address that in our</p> <p>12 conversation.</p> <p>13 Q. So basically, you wanted to say</p> <p>14 Abby, just because you got over it</p> <p>15 right away, doesn't mean you should</p> <p>16 expect me to get over it right away?</p> <p>17 Is that true?</p> <p>18 A. Yes, but I asked --- I just</p> <p>19 asked her. I didn't confront her.</p> <p>20 Q. She said she felt threatened.</p> <p>21 Do you regret that you made her feel</p> <p>22 threatened?</p> <p>23 A. I do because Abby's one of the</p> <p>24 nicest people ever.</p> <p>25 Q. Now in paragraph 41, you said</p>

18 (Pages 66 to 69)

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<p>1 the conversation was witnessed by Ms. 2 Jones who, at no time, intervened 3 between the parties. Why would you 4 expect Ms. Jones to intervene? 5 A. Well if I would've lunged or 6 made any aggressive moves or 7 confronted somebody, because she was 8 there to mediate the conversation, I 9 think she would've stepped in if 10 something wrong or something wrong was 11 being said. 12 Q. Why would Mrs. Lyons ask Dr. 13 Shank's secretary to mediate a 14 conversation between a student and 15 her? 16 A. I don't know if she asked her 17 or not. And I don't know why. 18 Q. What does mediate mean? 19 A. To watch over the conversation. 20 Q. Is that it? 21 A. That's what she told us. 22 Q. Who's --- who told you? 23 A. Maria Jones told us that she 24 was there. 25 Q. Do you ---?</p>	<p>1 conversation with Jordan and the other 2 students did Ms. Jones state or imply 3 that Jordan had, in anyway, crossed 4 the line in his conversation with Mrs. 5 Lyons prior to this moment. 6 Is that the best of your 7 understanding as to why Ms. Jones said 8 nothing? 9 A. Yeah. She didn't say anything. 10 Q. But you're saying that if she 11 had something to say, it would've been 12 something --- it would've had 13 something to do with you crossing a 14 line. 15 Is that true? 16 A. It would've had something with 17 crossing the line meaning that I 18 would've stepped to somebody 19 aggressively or confronted somebody or 20 done something wrong. 21 Q. Okay. 22 Now if you come down to 23 paragraph 45, it says the following 24 day Jordan was called to the office 25 and told he could have a guardian</p>
Page 71	Page 73
<p>1 A. After the conversation, when I 2 was leaving, she told me and my family 3 and Haley and Vinny and Ray that she 4 was there to mediate the conversation 5 and watch over it. 6 Q. Are you sure that was the word 7 she used? 8 A. No. 9 Q. Okay. 10 So in paragraph 42 on the next 11 page, it says Ms. Jones came back to 12 Jordan and Vincent who had spoken with 13 Mrs. Lyons and Ms. Hartenstine in the 14 hallway. Present at the time were 15 also Jordan's parents and Haley. Ms. 16 Jones told this group both that 17 everything would be okay from here, 18 and encouraged them the school show 19 could move forward with everyone 20 working together. 21 Was that simply based on Ms. 22 Jones comprehension of what she saw 23 and heard to your knowledge? 24 A. Yes. 25 Q. It says at no time during this</p>	<p>1 present for an important meeting with 2 Dr. Shank, the Superintendent, and Mr. 3 Becker, the Oley Valley High School 4 Principal, and Jordan elected to call 5 Tara Eck, his legal guardian. 6 That's your mother. 7 Right? 8 A. That's correct. 9 Q. So you called your mother and 10 did she come down to the school? 11 A. She did. 12 Q. Okay. 13 It says Jordan was given no 14 advanced indication of what this 15 meeting was about. Why did you think 16 that you were entitled to advance 17 notification or indication? 18 A. I don't know. 19 Q. The next paragraph reads the 20 meeting commenced at roughly 10:00, at 21 which time Jordan was informed that he 22 was to be suspended for 23 insubordination and for making Ms. 24 Hartenstine feel threatened. 25 See that?</p>

19 (Pages 70 to 73)

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<p>1 A. Yep.</p> <p>2 Q. And is that correct?</p> <p>3 A. Yep.</p> <p>4 Q. Okay.</p> <p>5 In paragraph 48 it reads Jordan</p> <p>6 was informed that Ms. Hartenstine had</p> <p>7 written an email or letter to Mr.</p> <p>8 Becker, alleging that Jordan had</p> <p>9 lunged at her the day before. Ms.</p> <p>10 Hartenstine, Mr. Becker, and Dr. Shank</p> <p>11 knew the falsity of Ms. Hartenstine's</p> <p>12 assertions, acted with reckless</p> <p>13 disregard whether those assertions</p> <p>14 were false or not, acted with willful</p> <p>15 misconduct, or any of the forgoing.</p> <p>16 What does that mean?</p> <p>17 A. She said --- I asked how I</p> <p>18 threatened Abby, Mrs. Hartenstine.</p> <p>19 And she said that I was extremely rude</p> <p>20 to her. Dr. Shank recalled that I was</p> <p>21 extremely rude, and that I stepped in</p> <p>22 her face and I said what do you mean?</p> <p>23 And Dr. Shank stood up and stood over</p> <p>24 me and said that I did, she did the</p> <p>25 motion. Like, kind of stepping into</p>	<p>1 Handbook, was marked for</p> <p>2 identification.)</p> <p>3</p> <p>4 THE WITNES:</p> <p>5 Sorry.</p> <p>6 BY ATTORNEY O'DONNELL:</p> <p>7 Q. And if you would please,</p> <p>8 unfortunately this is not well marked.</p> <p>9 So I want to get to the section which</p> <p>10 talks about discipline. And ---.</p> <p>11 A. It's towards the end of the</p> <p>12 pages.</p> <p>13 Q. Okay.</p> <p>14 So it said --- it --- it's on</p> <p>15 the page that's entitled OVHS Code of</p> <p>16 Conduct?</p> <p>17 A. Yes.</p> <p>18 Q. So this does not apply to any</p> <p>19 other building but the high school.</p> <p>20 Right?</p> <p>21 A. That's correct.</p> <p>22 Q. Okay. Okay.</p> <p>23 So if you come down to the</p> <p>24 middle where it says OVHS Student Code</p> <p>25 of Conduct, and you come down to the</p>
Page 75	Page 77
<p>1 my personal bubble.</p> <p>2 Q. Like this?</p> <p>3 A. Yeah. And she said yeah, you</p> <p>4 lunged at her. And I was very</p> <p>5 confused because that's not what</p> <p>6 happened.</p> <p>7 Q. Because you don't remember</p> <p>8 lunging at her, do you?</p> <p>9 A. No.</p> <p>10 Q. And if you lunged at her in an</p> <p>11 emotional state, that's something you</p> <p>12 would remember?</p> <p>13 A. Yes.</p> <p>14 Q. Because you remember everything</p> <p>15 that you do when you're highly</p> <p>16 emotional?</p> <p>17 A. I'd say so.</p> <p>18 Q. Okay.</p> <p>19 I'd like you to flip to</p> <p>20 Exhibit 2, and we're going to mark</p> <p>21 Exhibit 2, the entire thing,</p> <p>22 Plaintiff's 6.</p> <p>23 ---</p> <p>24 (Whereupon, Plaintiff's</p> <p>25 Exhibit 6, Student</p>	<p>1 second paragraph where there are four</p> <p>2 subparagraphs listed. Do you see</p> <p>3 where I am?</p> <p>4 A. Yeah.</p> <p>5 Q. It begins with the Code</p> <p>6 includes?</p> <p>7 A. Uh-huh (yes).</p> <p>8 Q. Okay.</p> <p>9 So I'm just going to read that</p> <p>10 part, and it says the Code includes</p> <p>11 many of the strategies used to</p> <p>12 maintain a safe and disciplined</p> <p>13 environment. It also has a strong</p> <p>14 focus on a cooperative effort ---</p> <p>15 effort among students, parents and</p> <p>16 school personnel, and helps to define</p> <p>17 the essential role of each participant</p> <p>18 in the process.</p> <p>19 The maintenance of a positive</p> <p>20 learning climate in the schools of the</p> <p>21 district is dependent upon the</p> <p>22 provision of a controlled environment</p> <p>23 free from undue interference or</p> <p>24 disruption.</p> <p>25 To accomplish this objective,</p>

20 (Pages 74 to 77)

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<p>1 four critical elements must exist. 2 And then, it lists four critical 3 elements there. And what is number 4 three? Would you read that for me? 5 A. Students must be aware of rules 6 and regulations, and be willing to 7 assume responsibility for their 8 behavior. 9 Q. Okay. 10 Can you tell me when, prior to 11 this deposition, you last read the 12 high school Student Code of Conduct? 13 A. Probably a couple days after I 14 was suspended. 15 Q. Okay. 16 Now I'd like you to come with 17 me, two pages beyond that to the level 18 four corrections. And if you come all 19 the way down to the, almost the bottom 20 under the — in alphabetical order. 21 And so, there's the first, in the TS, 22 is terroristic threats. But 23 underneath that is threaten school 24 officials/faculty/staff. 25 Do you see that?</p>	<p>1 is directed at someone, the 2 consequence is going to be felt by 3 that person receiving it. Not 4 necessarily dependent on what's 5 intended. 6 Would you agree with me? 7 A. Sure. 8 Q. Okay. 9 For example, you didn't intend 10 to hurt Jared Mazeika's feelings or 11 threaten him in anyway when you — 12 your girlfriend posted a video of you 13 making jokes with — with three 14 fruits that were most fatally 15 poisonous to him, that could cause an 16 allergic reaction and maybe kill him. 17 Right? 18 You didn't intend to hurt him. 19 A. I mean, I was flirting with 20 Haley. 21 Q. Okay. 22 You were flirting with Haley, 23 and she posted that knowing that he 24 was a friend of hers. However, Jared 25 Mazeika is very sensitive to those</p>
Page 79	Page 81
<p>1 A. Yep. 2 Q. Okay. 3 Now if one of the faculty 4 members reported that a student made 5 her feel threatened, would that be a 6 level four infraction under this 7 Student Code of Conduct? 8 A. Yes. 9 Q. Okay. 10 Now the fact that you were 11 charged with a level three makes it 12 seem a little less offensive. 13 Right? Than a level four? 14 Correct? 15 A. Yeah. 16 Q. Okay. 17 A. Because I just asked her a 18 question. I didn't threaten her. She 19 just felt threatened. 20 Q. Well sometimes, would you 21 agree, the consequence of an action is 22 when someone receives it, not 23 necessarily when the person who's 24 delivering it feels it. 25 Would you agree? If an action</p>	<p>1 fruits. And so, they're like weapons 2 to him. You did not intend for him to 3 feel that way. 4 Right? 5 A. No. 6 Q. But the consequence was that he 7 felt threatened. 8 True? 9 A. Yes. 10 Q. Okay. 11 And the same way with Misses 12 — Ms. Hartenstine. You did not 13 intend for her to be — to feel like 14 she was under assault, but regardless, 15 she did speak to someone and say she 16 felt threatened by your behavior even 17 though you didn't intend for her to be 18 threatened. 19 Correct? 20 A. Correct. 21 Q. Okay. 22 A. I just asked her a question. 23 Q. All right. 24 Now if you come to me — to 25 Exhibit 6. Come with me to Exhibit 6.</p>

21 (Pages 78 to 81)

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<p>1 And come to the 11th page. We just 2 looked at the email which is on the 3 10th page, and if you come to the 11th 4 page, I'd like you to take a look at 5 that. 6 Okay? 7 A. Yep. 8 Q. This happens to be dated ---. 9 ATTORNEY READY: 10 I'm sorry, are we 11 talking about this page here, 12 the email, or the next page? 13 ATTORNEY O'DONNELL: 14 The 11th page. 15 ATTORNEY READY: 16 Okay. 17 ATTORNEY O'DONNELL: 18 Thank you. Okay, thank 19 you very much. 20 BY ATTORNEY O'DONNELL: 21 Q. Okay. 22 So this is dated the same date 23 as the Board meeting, March 20th of 24 2011. 25 Right?</p>	<p>1 witness. Is that the same context, or 2 definition, of the word you like to 3 use as mediator? 4 A. Yes. 5 Q. Okay. 6 Jordan did not object to myself 7 or Mrs. Jones being present during the 8 conversation. 9 Is that true? 10 A. Not out loud. I did not 11 verbally object, no. 12 Q. Okay. 13 Would they know any other way 14 if you objected to them being there? 15 A. No. 16 Q. Okay. 17 So the next paragraph reads the 18 majority of the conversation was 19 between Mrs. Lyons and Jordan. 20 Is that true? 21 A. That's true. 22 Q. At one point, Jordan looked at 23 me and said, well you're awfully 24 quiet. Don't you have anything to 25 say, in which I replied, I'm just</p>
Page 83	Page 85
<p>1 A. Right. 2 Q. And would you see --- would you 3 notice with me that it's signed off by 4 Abigail Hartenstine. Is that the same 5 lady you refer to as Abby? 6 A. That's correct. 7 Q. Okay. 8 And would you agree with me 9 that this is a letter directed to Dr. 10 Shank? 11 A. Correct. 12 Q. Okay. 13 Now let's read it together. 14 She said at approximately 10:00 p.m. 15 on Wednesday, March 20th, Jordan Eck 16 asked to speak privately with Mrs. 17 Stacy Lyons at the conclusion of 18 rehearsal. 19 Is that a correct time on that 20 date? 21 A. Yes. 22 Q. The next sentence reads, she 23 asked that I along with Mrs. Maria 24 Jones be there as a witness to the 25 conversation. She uses the word</p>	<p>1 listening. 2 My question to --- to you, is 3 do you have that relationship with 4 Misses --- Ms. Hartenstine? Are you 5 at --- are you allowed to speak to her 6 that way? Well you're awfully quiet, 7 don't you have anything to say? 8 That's pretty cavalier. 9 A. Not in that tone of voice. 10 Q. Okay. 11 Why would you ask something 12 like that of her? 13 A. I was asking, firstly, for her 14 input. To see if there could be 15 anything worked out between Misses --- 16 me and Mrs. Lyons. That was my intent 17 with that question. 18 Q. Okay. 19 She said, he proceeded to 20 question my own feelings about a 21 similar situation when I was in high 22 school back in 2009 and that I openly 23 shared with all of the cast back in 24 January about when I auditioned for 25 the leading role and did not get the</p>

22 (Pages 82 to 85)

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Page 86	Page 88
<p>1 part. 2 He told me that he just 3 couldn't believe that I wasn't upset 4 and wanted to be comforted about not 5 getting the leading part that I 6 auditioned for. In which I responded, 7 yes I was upset, but I made peace with 8 the decision, made sure my friend that 9 I was up against was okay after very 10 hurtful things were said about her, 11 moved on, and had a great show. 12 Do you remember that? 13 A. Yes. 14 Q. It goes on to say, Mrs. Lyons 15 asked Jordan if he was accusing me of 16 lying. 17 Do you remember that? 18 A. Yes. 19 Q. And then, he vocalized that he 20 still did not believe me, making me 21 feel like he was calling me a liar 22 about a situation he knows nothing 23 about that happened ten years ago. 24 Did you say you didn't believe 25 her? I still don't believe her?</p>	<p>1 certain tone of voice, I don't believe 2 you. 3 Right? I can make you feel 4 that way. Is that true? 5 A. Sure. 6 Q. And it's true that you can make 7 Misses ---- Ms. Hartenstine feel like 8 you're calling her a liar simply by 9 saying you don't believe her. 10 Right? It's possible? 11 A. Yeah. 12 Q. Okay. 13 She then goes on to say I felt 14 threatened and disrespected. And 15 again, you don't know of anything that 16 would invalidate her feelings except 17 your belief that you didn't intend to 18 do that, don't you? 19 A. I meant no harm. 20 Q. Okay. 21 She then goes on to say the 22 lack of respect that Jordan has shown 23 towards me as a dedicated teacher, 24 assistant director, and volunteer to 25 this program and district will no</p>
Page 87	Page 89
<p>1 A. Yes, but not in that tone of 2 voice. 3 Q. However, are you in any 4 position to invalidate the way she 5 felt when you said that you did not 6 believe her? 7 A. Can you rephrase your question? 8 Q. Do you know what invalidate 9 means? 10 A. No. Not in this context. 11 Q. When you tell someone directly 12 to their face you don't believe what 13 they're saying, how do you think they 14 feel? 15 A. I don't know. 16 Q. Like if I said, Jordan I don't 17 believe any of your testimony today. 18 How does that make you feel? 19 A. That maybe you just don't agree 20 with me. 21 Q. Or I'm calling you a liar, and 22 you don't know that. 23 Right? I could make you feel 24 like I'm calling you a liar if I said 25 to you, in a certain context and in a</p>	<p>1 longer be tolerated --- will not be 2 tolerated any longer. 3 So again, she says twice that 4 she feels a lack of respect. She felt 5 threatened and disrespected, and then 6 she shows --- she says that the lack 7 of respect that he's shown, that 8 Jordan has shown towards me will not 9 be tolerated by me is what she's 10 saying. 11 Right? 12 So what conversations did you 13 have with Ms. Hartenstine following 14 that, regarding her feelings and your 15 relationship with her going forward? 16 A. I had not spoken to her 17 afterwards. 18 Q. At all? 19 A. Uh-uh (no). 20 Q. You've never spoken to her 21 afterwards? 22 A. After that meeting? 23 Q. Yes? 24 A. (Indicates no). 25 Q. No.</p>

23 (Pages 86 to 89)

Page 90	Page 92
<p>1 A. Nor have there any been 2 instances where I disrespected her or 3 where I could've disrespected her 4 before this meeting. In fact, we had 5 what I thought a good relationship. 6 We bonded over chocolate milk. 7 Q. You were not present for 8 anything that Vinny said to Mrs. 9 Lyons. 10 Right? 11 A. No. They really wanted me to 12 leave the hallway. 13 Q. And Vinny was not present for 14 anything that you said to Mrs. Lyons. 15 Right? 16 A. Right. 17 Q. Okay 18 It was just Miss --- Ms. Jones 19 and Ms. Hartenstine that were present 20 for you conversation with Ms. Lyons. 21 Right? 22 A. Right. 23 Q. Okay. 24 Now if you come all the way 25 down the next page. Second paragraph.</p>	<p>1 Jordan could only think of himself at 2 this time, and no other parties. Ms. 3 Hartenstine was visibly upset and 4 tearful that Jordan accused her of 5 making this up. 6 Do you recall her being tearful 7 and visibly upset? 8 A. No. 9 Q. Okay. 10 It says Mrs. Lyons asked Jordan 11 if he did not see how he had Ms. 12 Hartenstine upset with his 13 accusations, but Jordan did not seem 14 to care about how his words and 15 actions made other people feel. 16 Do you recall Miss --- Miss --- 17 Mrs. Lyons pointing this out and 18 saying we're upsetting Ms. 19 Hartenstine, or you're upsetting Abby? 20 A. I'm sorry, can you repeat the 21 question? I was reading. 22 Q. Sure. Do you recall Mrs. Lyons 23 asking you whether or not you could 24 see, for yourself, that Abby was upset 25 about your accusations?</p>
Page 91	Page 93
<p>1 Just for you edification, the --- this 2 is a two page document. If you look 3 at the second page, it's signed by 4 Maria Jones. 5 Do you see that? 6 A. Okay, yes. 7 Q. Have you seen this document 8 before today? 9 A. Never. 10 Q. Okay. 11 So this is a statement that she 12 prepared. If you come down to the, 13 almost the bottom of the second full 14 paragraph. She's at the part where 15 Jordan said who would do that? Why 16 would you not want to be comforted if 17 you didn't get the part? 18 Who would not want to be 19 comforted? 20 A. Huh? 21 Q. Do you remember saying those 22 things to Ms. Hartenstine? 23 A. Yes. 24 Q. Okay. 25 She states it was evident</p>	<p>1 A. No. 2 Q. Maria goes on to state, he said 3 at one point to Mrs. Lyons, this is 4 you. I was going to hang you out to 5 dry, I really was. And I'm not saying 6 that they have to fire you, but Jordan 7 said he was not sure how to move 8 forward and Mrs. Lyons suggested being 9 calm. Coming to rehearsals with a 10 calm attitude, greeting the other 11 students and apologizing to them, 12 reaching a hand out to them, and 13 asking them to work together with him. 14 Do you remember any of that? 15 A. I don't remember saying that. 16 Q. It said Jordan said he had a 17 lot of homework to do, and nodded at 18 us and left. 19 Do you remember that? 20 A. I remember leaving. 21 Q. At the very bottom of the first 22 full paragraph, its --- it --- like 23 six lines up from the bottom, it says 24 Vinny said he would contact with Mrs. 25 Zackon outside of school. Do you know</p>

24 (Pages 90 to 93)

Page 94	Page 96
<p>1 if Vinny had a relationship with Mrs. 2 Zackon? 3 A. No. 4 Q. It states I asked him if he 5 knew how to contact her, and he 6 nodded. Do you know whether his 7 parents had a relationship with Mrs. 8 Zackon? 9 A. Nope. 10 Q. After that, it says I told them 11 all board members' names and addresses 12 are public information and he nodded. 13 Jordan turned to me and said I'm going 14 to get more people. We'll get more 15 people. This isn't over. 16 Do you remember saying that? 17 A. Nope. 18 Q. It says Jordan appeared angry, 19 staring at me when he said this. No 20 recollection of that? 21 A. No. 22 Q. No? Ms. Jones goes on to state 23 I am a support staff member, and not 24 an educator but I was concerned with 25 the anger and lack of empathy I</p>	<p>1 of anger and lack of awareness of 2 other's feelings. Do you have any 3 recollection of being that angry? 4 A. No. 5 Q. Okay. 6 The next page I'll represent to 7 you is an email from Ann Marie Borovik 8 to the Principal and the 9 Superintendent of the building. 10 It -- it says, I was 11 previously informed that there was a 12 mediation between some of the members 13 of the drama club. And this is before 14 the School Board meeting. So can you 15 tell me what kind of mediation, if 16 any, was conducted? Mediation meaning 17 an -- an attempt to settle disputes. 18 A. Not before the School Board 19 meeting. I don't know anything about 20 this. 21 Q. Okay. 22 It says the details of that 23 mediation were not shared, but it was 24 conveyed to me that all parties agreed 25 to move forward with a positive</p>
Page 95	Page 97
<p>1 observed in Jordan. Whenever 2 something was said that he did not 3 agree with, there was headshaking and 4 clenching of fists. And do you recall 5 any of that behavior on your part? 6 A. I remember shaking my head. 7 Q. Okay. 8 No clenching of fists though? 9 A. I don't remember. 10 Q. Okay. 11 Then it says he appeared that 12 if he did not get what he wanted, he 13 would not be satisfied no matter what 14 accommodations or resources could be 15 offered. Were you looking to get, 16 like total capitulation from Mrs. 17 Lyons? 18 A. What does that mean? 19 Q. She totally surrenders, and she 20 just says okay, you're right and I'll 21 -- and I'll make the changes you 22 want? 23 A. No. 24 Q. In my daily interactions with 25 students, I have not seen this level</p>	<p>1 attitude and participation in the 2 musical. So you weren't part of that? 3 A. I'm sorry, where are we at? 4 Q. We are on the very next page, 5 after Maria Jones, second page memo, 6 two page memo. There is an email 7 that's from Ann Marie Borovik to Chris 8 Becker and Dr. Shank. And I am 9 literally on the very first paragraph. 10 It says hello, I was previously 11 informed. 12 ATTORNEY READY: 13 Sorry, I don't have 14 that. 15 THE WITNES: 16 That's two pages later. 17 BY ATTORNEY O'DONNELL: 18 Q. Okay. 19 A. Okay. 20 Q. Then go there. Sorry about 21 that. 22 Okay. 23 So again, this is the day 24 before the Board meeting. And Ann 25 Marie Borovik, who is a guidance</p>

25 (Pages 94 to 97)

Page 98	Page 100
<p>1 counselor, yes? 2 A. Yes. 3 Q. Writes to the building 4 Principal and the Superintendent, I 5 was previously informed that --- that 6 there was a mediation between some of 7 the members of the drama club. And 8 again, your testimony is that you were 9 not present at that mediation. 10 Is that correct? 11 Mediation meaning an attempt to 12 settle disputes. 13 A. There was a meeting with me, 14 Jared, Dr. Shank, Mrs. Lyons, and Dawn 15 Cambria about how we agreed to move on 16 with the show before the School Board 17 meeting. 18 Q. Okay. 19 And so, when was that? 20 A. I don't know off the top of my 21 head. This would've been before any 22 fruit video and after I found out 23 about the mandated reporting that Mrs. 24 Lyons accused me of. 25 Q. So when you say mandated</p>	<p>1 A. An understudy show is a show 2 that we did also at the fall play. 3 where, to show where the understudies 4 fill in instead of the lead roles that 5 rehearsed for the cast. 6 Q. I see. So that you got to play 7 Jack? Who did you play as an 8 understudy? 9 A. I would play Jack, and at a 10 previous meeting with Jared where we'd 11 spoken privately, he said yeah. 12 That'd be great, and we'll just have 13 to talk to Mrs. Lyons. And then we 14 went to ask her, she kind of 15 retaliated and like was very 16 condescending and rude to us, saying 17 it would never happen. How Oley 18 doesn't really matter compared to the 19 bigger schools so why you even asking 20 me? That sort of thing. 21 And so, in an effort to quell 22 all that, this meeting was okay, let's 23 just move on from here. 24 Q. Okay. 25 The next paragraph says Jared</p>
Page 99	Page 101
<p>1 reporting, that means calling 2 ChildLine or calling the police. Did 3 anybody call child --- did Mrs. Lyons 4 call ChildLine or the police? 5 A. No. She told Dr. Shank and 6 Dawn Cambria, who told me. 7 Q. Okay. 8 So she told Dr. Shank and Dawn 9 Cambria that Jared had made a 10 complaint about this video. 11 Is that right? 12 A. No, she's --- she told Dr. 13 Shank and Dawn Cambria that I was 14 abusing Haley. 15 Q. Okay. Okay. All right. 16 A. And so, this meeting was an 17 effort to settle that ---. 18 Q. About the Haley situation? 19 A. About the Haley situation, and 20 about the understudy situation because 21 I'd asked for an understudy for, like, 22 an understudy show for Newsies. 23 Q. Okay. 24 And why did you want an 25 understudy show? What does that mean?</p>	<p>1 came to me on Monday, March 18th. And 2 that was the day before --- two days 3 before the Board meeting, and shared 4 with me an incident that happened 5 earlier that day between Haley 6 Hartline and himself. 7 He also shared that he felt 8 concerned for his safety based on a 9 video that was posted on Snapchat. I 10 was told that the video was of Jordan, 11 and in it he had an apple, pear, and 12 banana. Those three fruits are what 13 Jared is allergic to. I had asked how 14 others would know this, and he said it 15 was a running joke and everyone in the 16 musical knows about it. I had him 17 fill out an incident report. 18 In the next paragraph, it says 19 we discussed having a mediation with 20 him and Jordan and he was worried that 21 this would great more animosity, or 22 anger, with Jordan. He was thinking 23 of quitting musical. I shared that I 24 supported him fully, but wanted him to 25 talk to Mrs. Lyons about this first</p>

26 (Pages 98 to 101)

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<p>1 and she if she had any ideas to get 2 everyone to peacefully coexist. 3 So what was happening up then? 4 Why — why do you think Jared would 5 think that trying to mediate with you 6 would create more animosity or anger? 7 A. Well this incident, if we go 8 back to the first paragraph, Jared 9 came to me on Monday. He ended up 10 throwing a binder at Haley. I wasn't 11 at school because that day I didn't 12 feel well also. 13 The joke, I didn't know that 14 was a running joke in the musical. 15 And --- what was your question? 16 Q. Sure. Why do you think — why 17 do you think Jared would think that it 18 would simply accelerate your animosity 19 or anger if he tried to approach you 20 about this? 21 A. I don't know. 22 Q. At the top of the next page, it 23 says Mr. Becker and I met with Jordan 24 and wanted to remind him of the work 25 release contract that he is in place</p>	<p>1 Snapchat where you send, like, streaks 2 to people to keep the --- it's 3 something on Snapchat. And he sent 4 back his middle finger. And I told 5 them that. 6 Q. But it wasn't directed to you. 7 Right? 8 A. I don't know who it was direct 9 to, but it was sent to that student. 10 Q. Okay. 11 And why did you tell the 12 administration about Jared giving the 13 middle finger to another student? 14 A. That's all I knew about any 15 Snapchat thing. 16 Q. So then the next thing you 17 bring up is not just Jared giving the 18 middle finger to another student on 19 Snapchat, but then the next thing you 20 talked to them about is your intent to 21 meet with Dr. Shank and approximately 22 six additional students --- 23 A. Right. 24 Q. --- about the issue they have 25 with Mrs. Lyons. He respectfully</p>
Page 103	Page 105
<p>1 --- that is in place, and how we need 2 to know he remains in the school to 3 make sure that we are aware. Is that 4 because you didn't go to work and 5 stayed in school at some point? 6 A. No. One of the days I forgot 7 to sign out. 8 Q. It said he reported that he was 9 not aware of any Snapchat videos that 10 were of inappropriate nature except 11 for one of Jared giving the middle 12 finger to another student. And how 13 did you know about that? 14 A. During that — the night 15 before that Jared sent the middle 16 finger to another student, we were at 17 a middle school rehearsal because I 18 help to assist the direct — the 19 middle school. And he was also there. 20 And the Director asked him to move to 21 the other side because he was 22 distracting actresses. 23 And he left, and that student 24 who he sent the middle finger to, sent 25 him a picture. It's like a thing on</p>	<p>1 stated that there's a lot that we're 2 aware of, and it needs to be addressed 3 by Dr. Shank. He stated that it would 4 either be her or I that if Mrs. Lyons 5 is not fired and these other students 6 --- that he and the other students 7 would quit the musical. 8 Do you remember saying that? 9 A. I don't remember saying that. 10 Q. Okay. 11 We will then --- we then 12 advised Jordan how to pursue a meeting 13 with Dr. Shank as she was out of the 14 building today. From what I know, he 15 then pursued this meeting with Dr. 16 Shank's administrative assistant, Deb 17 Bernecker. 18 Did you set up a meeting with 19 Deb, or did you ---? 20 A. There was no meeting with Dr. 21 Shank. She refused to meet with me 22 the day of the School Board meeting 23 even though I wanted to. 24 Q. Okay. 25 The next paragraph reads Mr.</p>

27 (Pages 102 to 105)

Page 106	Page 108
<p>1 Becker and I were advised to reach out 2 --- Mr. Becker and I were advised to 3 reach out to Central Burks Police, 4 that they would be receiving a report 5 from Mrs. Mizeika. We made that call 6 around 10:55 and spoke with Officer 7 Smith. 8 We shared the information about 9 the Snapchat video as well as the 10 dance studio parking lot incident. We 11 also shared that there had been some 12 drama previously about these musical 13 roles that had been mediated 14 previously. 15 Do you see that? 16 A. Yes. 17 Q. So in fact, the guidance 18 counselor and Mr. Becker actually 19 called the police to advise them Mrs. 20 Mazeika would be calling them, and 21 that there was some kind of tension 22 between two boys had --- who had 23 competed for the lead role in a play. 24 Were you aware of that? 25 A. I was not aware that they</p>	<p>1 Q. Okay. 2 And what did she tell you? 3 A. That I shouldn't post anything 4 inappropriate or you know, there 5 shouldn't be any cyber bullying on 6 social media. 7 Q. Okay. 8 It says we finished off with 9 making sure that should we meet with 10 Jordan to ask other questions that we 11 will make sure we have her contact or 12 her approval. And do you know whether 13 or not she was ever contacted after 14 that? 15 A. I don't know whether or not my 16 mother was contacted by Mrs. Borovik 17 and Mr. Becker after that moment. 18 Q. Okay. 19 The next page, this is --- 20 these are drama notes and they're 21 dated 2/5/19. So this is in February 22 and it's regarding Jordan Eck, Dr. 23 Shank, and Dawn Cambria. Met in Dawn 24 Cambria's office to ask Jordan Eck if 25 Haley Hartline, his girlfriend, was</p>
Page 107	Page 109
<p>1 called the police. 2 Q. Okay. 3 Next paragraph reads, Mr. 4 Becker and I returned a phone call 5 from Mrs. Eck. Do you know whether or 6 not she was advised that they called 7 the police? 8 A. No, she was not advised. 9 Q. It says she shared with us that 10 she would like to be present for nay 11 interrogation of her son, regardless 12 of the nature. We shared with Mrs. 13 Eck the nature of our conversation 14 with Jordan. I wanted to reassure 15 Mrs. Eck that we were not asking 16 questions pertaining to the musical, 17 but about in school incidents. She 18 assured me that Jordan is well aware 19 of the severity of his actions should 20 he be posting anything inappropriate 21 on school media. 22 Did you have a conversation 23 with your mother about posting on 24 social media? 25 A. Yes.</p>	<p>1 okay. Reports were made that Haley 2 was not eating, losing weight, and 3 depressed. Also concern that Jordan 4 Eck is controlling Haley and verbally 5 abusing Haley. Ann Marie, counselor, 6 talked with Haley. Jordan confirmed 7 that Haley is eating and everything is 8 fine. Jordan feels hurt that anyone 9 would say that he would abuse Haley 10 because he loves her. Jordan said 11 Haley comes to his house daily. 12 Do you recall that 13 conversation? 14 A. Yes. 15 Q. Okay. 16 Three paragraphs down, it says 17 that evening Dr. Shank and Dawn met 18 individually with Jared, Jordan, 19 Haley, and Mrs. Lyons then met them as 20 a group. We talked about Haley eating 21 and safety, moving forward, and 22 focusing on making the play great. 23 Do you see that? 24 A. Yep. 25 Q. Okay.</p>

28 (Pages 106 to 109)

Page 110	Page 112
<p>1 Now did you still have a 2 problem with Mrs. Lyons even though 3 you had this conversation? 4 A. Yeah, with --- with how 5 rehearsals were being ran. 6 Q. Okay. 7 But you reported --- 8 A. This --- this meeting was about 9 moving on with the understudy idea. 10 Q. Well it doesn't say that. 11 Right? It says --- 12 A. Right. 13 Q. --- they talked --- they talked 14 to you about reports that Haley was 15 not eating and losing weight, and that 16 you were controlling Haley and 17 verbally abusing her. Remember? 18 A. Yeah. We didn't talk about 19 that at that meeting. At that 20 meeting, they started by saying there 21 would not be an understudy show. And 22 then they moved on so on a different 23 note, in fact it was --- it was these 24 exact words, on a different note, are 25 you not letting Haley eat? And then</p>	<p>1 I talked to Mr. Becker about things 2 going on. And then he told me that 3 there were --- there were chats about 4 an understudy show. So I went to Dr. 5 Shank and asked her about it. 6 Q. Okay. 7 And then, the next paragraph 8 reads Alexa Henry, Oley graduate, told 9 Stacey Lyons that Jordan Eck is 10 controlling of Haley Hartline because 11 Alexa asked Haley to sleep over. 12 Haley did not want to sleep at Alexa's 13 house and said no. This was 14 misinterpreted as Jordan Eck not 15 wanting Haley to go Alexa's house and 16 that Jordan Eck is controlling. Alexa 17 told Stacey Lyons this story, and 18 everything was blown out of 19 proportion. 20 It says Jared Eck. I guess it 21 should say Jordan Eck is hurt that 22 anyone would think he's trying to 23 control Haley. Alexa also told Stacey 24 Lyons that Haley Hartline passed out 25 multiple times.</p>
Page 111	Page 113
<p>1 we went into that conversation. 2 Q. Okay. Okay. 3 The next day, call from Mrs. 4 Eck to Dawn Cambria. Mrs. Eck wants a 5 meeting with her husband, Stacy Lyons, 6 Dr. Shank, and Dawn Cambria. 7 Were you aware of that? 8 A. Yes. 9 Q. It says during the phone 10 conversation, Mrs. Eck stated the 11 following. Either Dr. Shank or Stacy 12 Lyons is not telling the truth about 13 Jordan sharing the show with Jared. 14 It was Dr. Shank's idea to have an 15 understudy show, now there will not be 16 an understudy. An understudy was not 17 Jordan Eck's idea. 18 Your testimony earlier was that 19 in the fall of that year, there was an 20 understudy show and you thought it was 21 a good idea to have an understudy show 22 and wanted to approach Mrs. Lyons 23 together with --- with Jared. 24 Right? 25 A. Well I asked Dr. Shank --- well</p>	<p>1 Do you know anything about 2 Haley passing out multiple times? 3 A. No, she only passed out once. 4 Q. Okay. 5 A. To my knowledge. 6 Q. And you can't dispute anything 7 that Alexa told to Stacy Lyons. 8 Right? 9 A. Right because I don't know what 10 she said to her, but --- 11 Q. And --- 12 A. --- I talked to her on the 13 phone. Alexa. 14 Q. And she may not have told you 15 everything she told to Stacey Lyons. 16 Right? 17 A. Right. 18 Q. Okay 19 And otherwise, Stacy Lyons 20 wouldn't know whether or not Haley ate 21 or didn't eat, whether she passed out 22 or didn't pass out. 23 Right? 24 A. She would know what Alexa told 25 her.</p>

29 (Pages 110 to 113)

Page 114	Page 116
<p>1 Q. Okay. 2 Let's --- this is at the very 3 bottom. Sixteen (16) years, Jared 4 Mazeika and Alex --- Alexa bought 5 Jordan Eck a princess dress and 6 princess card. Jared wants to 7 embarrass Jordan Eck. Jared Mazeika 8 and Alexa both bought you a princess 9 dress? 10 A. Right. At the time, Jared and 11 Alexa had been boyfriend and 12 girlfriend. 13 Q. Okay. 14 A. And after that --- my surprise 15 birthday, Alexa had told me that he 16 was doing it to embarrass me. 17 Q. Okay. 18 Who said this? On the next 19 page, this is page 2 of these notes. 20 I'm concerned about Jordan Eck. 21 Nobody is listening to me, everything 22 is a lie. I already went through 23 Logan older son trying to commit 24 suicide after graduating from HS. 25 What is --- what is that about?</p>	<p>1 feels that Stacy Lyons should have 2 consequences for stirring up trouble. 3 What trouble did Mrs. Lyons 4 stir up that your mother felt that 5 there should be consequences for? 6 A. Well for example, as soon as 7 that happened, people like changed 8 their opinions on me. As did the 9 email. 10 Q. Whose people, what people 11 changed their opinion? 12 A. People didn't talk to me as 13 much. People started giving me cold 14 looks. 15 Q. Who's people? What people? 16 A. Cast members. 17 Q. Who? 18 A. Cast members in Newsies. 19 Q. Name names. 20 A. In general. As a Lackey, 21 Madison Wartsinlauff. If I had --- 22 most of the cast. Mostly 23 underclassmen. 24 Q. Okay. 25 A few lines down, it says</p>
Page 115	Page 117
<p>1 A. You want to know about my 2 brother's suicidal thoughts? 3 Q. No. I'm asking who's saying 4 nobody is listening to me, everything 5 is a lie. 6 A. My mother. 7 Q. Okay. 8 Couple lines down, it said I 9 was in the inner circle of drama and 10 Stacy Lyons talks about other kids, 11 gets her way, vindictive, and passive 12 aggressive. Kids are crying on stage. 13 If she is ugly, kids must tell Dr. 14 Shank. 15 Did your mother also say that? 16 A. I don't know for sure, but it 17 sounds like something she would say. 18 Q. Kids are crying on stage. Were 19 you one of the kids crying on stage? 20 A. No. 21 Q. Okay. 22 A few lines down from that, it 23 says people do not believe that Jordan 24 does not abuse Haley and Jordan did 25 not request an understudy. Mrs. Eck</p>	<p>1 Jordan Eck has a journal of times and 2 things Stacy Lyons says during 3 practice. 4 A. Yep. 5 Q. Do you still have that? 6 A. I did at one point. It's 7 mostly written out in my 8 Interrogatory. 9 Q. Okay. 10 I want eyes on rehearsals, and 11 someone to check on Jordan Eck's 12 feelings. Is that something your 13 mother said? 14 A. I don't know. 15 Q. Why would someone need to check 16 on your feelings? 17 A. Because Mrs. Lyons keep 18 spreading these things about me 19 through her --- through Jared and 20 through students. 21 Q. When you say ---, 22 A. For example, like Courtney 23 Moyer. 24 Q. Okay. 25 A. She's --- one day, I held an</p>

30 (Pages 114 to 117)

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<p>1 optional tap rehearsal. And Jared's 2 also a dance captain. And so I'm 3 assuming that he was offended that I 4 held a -- an optional tap rehearsal 5 for people to practice as the 6 President of the drama club. And he 7 told Mrs. Lyons, who told Courtney 8 that I was overstepping my boundaries. 9 Q. Do you have -- do you have an 10 emotional disability? 11 A. No. 12 Q. Okay. Okay. 13 The next --- the next entry 14 here is last Friday, Jared Mazeika and 15 Jordan Eck talked from 10:00 to 10:45. 16 They are fine, they dance together 17 every Monday night. Is this at tap? 18 A. Yes. This would've been after 19 --- no. This is separate. This is at 20 our dance studio. So this is outside 21 of school. 22 Q. Okay. 23 A. This is when we talked about 24 the show, and this is when I brought 25 up the idea of the understudy show and</p>	<p>1 conversation. And she asked me how I 2 was doing and I said I was doing fine, 3 but I -- I didn't right out say, but 4 I was disappointed that it didn't seem 5 like anything was changing. 6 And my body language I guess 7 said to Dawn that she had to send an 8 IEP out. And she told my mom that 9 she'd be sending an IEP. When really, 10 I was just mad because it didn't seem 11 like anything was changing within the 12 drama club after that conversation. 13 Q. So this says Mrs. Eck talked 14 with Jordan and both want to know why 15 Jared and -- Mazeika, and Stacy Lyons 16 were not made to apologize for lying 17 about the understudy and relationship 18 with Haley Hartline. 19 What would Mrs. Lyons have to 20 apologize to you about? 21 A. About sending in the mandatory 22 report because it affected me greatly. 23 Q. Do --- well what does mandatory 24 report mean to you? 25 A. A mandated report means that</p>
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<p>1 he said yeah, that'd be a great idea. 2 And we talked about working together 3 to make the show as best as possible. 4 Q. Okay. 5 Next page, this is page 3. 6 2/22/19, Mrs. Eck and Dawn Cambria 7 phone conversation after a request via 8 email. Request on 2/19/19. Says Mrs. 9 Eck talked with Jordan Eck and both 10 want to know why Jared Mazeika and 11 Stacy Lyons were not made to apologize 12 for lying about the understudy and 13 relationship with Haley Hartline. 14 This has made Jordan Eck miserable. 15 A. Yes, so --- I'm sorry. 16 Q. Nope, that -- go ahead. What 17 -- I'd love an explanation for that. 18 A. Is that your question? 19 Q. Yes. 20 A. Okay. 21 Q. That is my question. 22 A. At one point, I believe it says 23 down here --- at one point, I met with 24 Dawn Cambria before my mother talked 25 to her. This was after the mediated</p>	<p>1 -- well, it's obviously different to 2 Mrs. Lyons. She --- she thought that 3 I was abusing Haley. 4 Q. Because Alexa told her? 5 A. Right, but Alexa said that she 6 didn't tell her that. 7 Q. Okay. 8 But Mrs. Lyons had to know some 9 way. 10 Right? She couldn't possibly 11 have that information about Haley 12 unless someone told her and Haley 13 didn't tell her. 14 Right? 15 A. Right, so ---. 16 Q. And --- and you didn't tell 17 her. 18 Right? 19 A. Right. 20 Q. And her mother didn't tell her. 21 But Stacy said Alexa told her. 22 A. But Alexa said she didn't tell 23 her. 24 Q. Okay. 25 But if you --- if you --- if</p>

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<p>1 you believe Mrs. Lyons that she go the 2 information from someplace, and I 3 realize you're shaking your head and 4 you don't believe Mrs. Lyons. 5 But there is no evidence in 6 this case that Mrs. Lyons got that 7 information from anyone other than 8 Alexa. Now why would, and --- and if 9 she's a mandated reporter and she has 10 no choice but to report it up the 11 chain, then that's her job to take 12 information that is potentially 13 harmful to a student and report it. 14 So that's what a mandate 15 --- mandated report is. 16 A. Right. 17 Q. Now why would she apologize to 18 you for doing her job? 19 A. She didn't even acknowledge 20 anything about it. I mean, an apology 21 was a suggestion on how to make things 22 better. 23 Q. Underneath that, it says Mrs. 24 Eck stated the following. Mrs. Eck 25 said Jordan Eck treats Mrs. Eck like</p>	<p>1 were you behaving that way at home? 2 The way your mother describes? 3 A. I mean, me and my mom had 4 disagreements. 5 Q. Underneath that, it says Jordan 6 Eck is carrying around no apology. Do 7 you agree with that? 8 A. I don't know what that means. 9 Q. Do you want other people to 10 apologize to you, but you have no 11 apologies for them? Do you agree with 12 that? 13 ATTORNEY READY: 14 Object to the 15 characterization of that 16 sentence. 17 ATTORNEY O'DONNELL: 18 Okay. 19 BY ATTORNEY O'DONNELL: 20 Q. Jordan Eck is carrying around 21 no apology. Did you apologize to 22 anyone for your behavior? 23 A. I offered to apologize to Abby. 24 Q. Okay. 25 You didn't tell me that</p>
Page 123	Page 125
<p>1 she is awful. Jordan Eck said he will 2 move out at 18 and life will be grand. 3 This whole thing changed his outlook. 4 He is trying to push his limits. Mrs. 5 Eck has rules. She feels like a 6 crappy parent and lets Jordan do what 7 he wants. 8 If he wants Haley at the house, 9 he brings her to the house. He does 10 what he wants, and leaves when he 11 wants. He will debate until the end. 12 He is a procrastinator with his work 13 and needs reminders. 14 This has been going on, but 15 recently it has escalated. Jordan Eck 16 was accepted to University of the 17 Arts, first choice DeSales and 18 Hofstra. Jared ---, 19 A. That's Hofstra. 20 Q. Is that supposed to be ---? 21 A. Hofstra. 22 Q. Hofstra? Okay. 23 Jared Mazeika and Haley 24 Hartline were also accepted at 25 DeSales, whatever that means. But</p>	<p>1 earlier. 2 A. But I didn't. 3 Q. Okay. 4 But you didn't apologize to 5 her? 6 A. No. 7 Q. Okay. 8 A. Because I never lunged at her, 9 or tried to threaten her in any way. 10 Q. If you will turn to the next 11 several pages. There's a disciplinary 12 referral form with your name on it. 13 Are you there with me? 14 A. No, hold on. 15 Okay, yes. 16 Q. Okay. 17 It's dated March 21st of 2019. 18 Play practice was the period of class, 19 and the incident was 9:30 a.m. What 20 happened here? 21 A. Incident? I don't know what 22 this is. 23 Q. Okay. 24 A. Jared --- okay. Suspension. 25 Is this --- okay. So is this what</p>

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<p>1 they wrote after my meeting saying 2 that I was suspended? 3 Q. Well it says location of 4 incident auditorium. So it appears 5 that ---. 6 A. This is Abby's discipline 7 referral to me. 8 Q. Okay. 9 A. I see. 10 Q. Okay. 11 So bullying is checked as the 12 problem behavior, although it could 13 have said threat. 14 Right? Or inappropriate 15 language, comment, gesture. 16 Disrespect, insubordination. There's 17 a number of things that could have 18 been checked, but she checked 19 bullying. And I'm assuming because 20 you've spoken to Abby since that last 21 communication where she felt 22 threatened. You didn't ask her why 23 she --- she would check bullying. 24 Is that correct? 25 A. That's --- I didn't --- I never</p>	<p>1 A. They kept me on as the National 2 Honors Society Vice President due to 3 what Dr. Shank said, extenuating 4 circumstances is the phrasology she 5 used. 6 Q. Okay. 7 The next paragraph, this is an 8 email from Tracy Shank to all. And 9 it's dated the 20th of March at 11:39 10 p.m. And the subject is FYI, tonight, 11 at tonight it says. She reads, I went 12 to the auditorium tonight after the 13 meeting to speak with the Directors 14 only to walk into the aftermath of a 15 negative situation whereby Jordan was 16 speaking to the cast, thanking them 17 for supporting him and helping him get 18 things changed. 19 Do you recall doing that? 20 A. I didn't thank them for 21 supporting me. I said thank you for 22 voicing your opinions. 23 Q. Okay. 24 A. They matter a lot. 25 Q. Then it says, he then verbally</p>
Page 127	Page 129
<p>1 saw this. 2 Q. Okay. 3 A. So I wouldn't have the chance 4 to ask her that. 5 Q. Okay. 6 And is it true that you 7 received an out of school suspension 8 for the 22nd, 25th, and 26th? 9 A. I received a three day school 10 suspension. I don't know if it were 11 those dates or not. 12 Q. Okay. 13 And is it true that you were 14 removed from the play? 15 A. That's correct. 16 Q. And is it true that you were 17 removed as the drama club President? 18 A. That's correct. 19 Q. And --- okay. And it says 20 here, a statement regarding threats 21 and disrespect to OVSD staff. See 22 that? And it's signed by --- do you 23 recognize that signature? 24 A. It looks like Mr. Becker's. 25 Q. Okay.</p>	<p>1 accosted the assistant director and 2 accused her of lying and not speaking 3 up. And then closed with, this is not 4 over and I will be getting more people 5 to come forward. 6 Do you recall that? 7 A. Never said that. 8 Q. Okay. 9 It says the teacher was visibly 10 upset, crying, and felt threatened by 11 him. And used the words, verbally 12 attacked. And you don't remember any 13 of that? 14 A. No. 15 Q. No? She then goes on to state, 16 I'm obtaining the statements from the 17 teacher and witnessed by Maria and the 18 teacher. Next paragraph, I am going 19 to issue discipline regarding 20 tonight's situation. And depending on 21 what the rest of the investigation 22 reveals tomorrow, Jordan may have just 23 finished rehearsal tonight. 24 Students are angry with him for 25 his actions when he returned to the</p>

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<p>1 auditorium after he left at the Board 2 meeting. 3 Did you know anything about 4 those people being angry with you? 5 A. Nope. 6 Q. Okay. 7 A. I think they were angry because 8 they thought I was trying to ruin the 9 show based upon Mrs. Lyons' email. 10 Q. And that would've been the 11 students that --- that were present 12 after you returned to the auditorium 13 and after --- after you left the Board 14 meeting. So right after the Board 15 meeting and when you returned to the 16 auditorium, you --- you stated your 17 action --- describe again for me your 18 actions when you came back into --- 19 well you didn't come back. You came 20 to rehearsal for the first time on 21 March 20th. 22 A. I came back to rehearsal after 23 the School Board meeting. 24 Q. Did you come back, or --- you 25 were never there to begin with so you</p>	<p>1 auditorium after he left the Board 2 meeting. So again, remind me what 3 those actions were. 4 A. I got up on stage and danced. 5 Q. That was it? 6 A. That's it. 7 Q. Okay. 8 A. In the choreography. I didn't 9 like dance by myself. I was --- I 10 joined in the choreography in the 11 school. That's what I meant. 12 Q. Do you know who Sherri Snyder 13 is? 14 A. She's the attendance lady, yes. 15 Q. Okay, okay. 16 And on March 20th of 2019 --- 17 20th of 2019, at about 2:00, she 18 states that at 10:00 a.m., Mrs. Eck 19 and her husband came to the high 20 school and requested to speak with Mr. 21 Becker and Dr. Shank regarding a 22 matter. 23 Do you recall that your parents 24 went to school that morning? 25 A. I believe so, yes.</p>
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<p>1 wouldn't have come back. You've just 2 come. 3 Right? Because you ---. 4 A. Right, but I was cast in the 5 show so I'd been at previous 6 rehearsals is what I meant. 7 Q. Okay. 8 So --- but that day on March 9 20th, you were not in school for a 10 period of time. You didn't go to 11 work. You went to Ferrizzi's house to 12 plan and prepare your statement 13 against Mrs. Lyons. You came to the 14 Board meeting to speak against Mrs. 15 Lyons, you talked to people after the 16 Board meeting being a little late to 17 rehearsal, and then walked into 18 rehearsal. 19 Right? 20 A. Yeah. 21 Q. Okay. 22 Those are the students that 23 we're making reference to here. 24 Students are angry with him for his 25 actions when he returned to the</p>	<p>1 Q. Okay. 2 Do you know why they were 3 there? 4 A. No. I don't --- I don't know 5 why they were there. It was probably 6 something to do with the video, the 7 fruit video, and the defamatory email. 8 Q. Okay. 9 At the very end of this email, 10 it states Mr. Becker told the Eck's 11 that if Jordan was upset, that they 12 could take him out of school for the 13 remainder of the day and it would be 14 excused. Does that refresh your 15 recollection about when you left and 16 why? 17 A. Yes, it does. 18 Q. Okay. 19 So if you left around 10:00 20 that morning, you still called off 21 work? 22 A. Yeah, I wanted to let my boss 23 know. 24 Q. Okay. 25 And then it states at that</p>

34 (Pages 130 to 133)

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<p>1 time, Haley Hartline requested to go 2 home as well because the situation had 3 her upset too. 4 A. That's correct. 5 Q. Do you remember that? I spoke 6 with her mother to get verbal 7 permission to allow Haley to leave 8 school as well and they all left 9 around 10:20 a.m. 10 Is that right? 11 A. That's correct. 12 Q. And where did you go after 13 that? 14 A. I went -- well, we went home. 15 Q. Okay. All right. 16 ATTORNEY O'DONNELL: 17 Those are all questions 18 I have. Thank you very much. 19 THE WITNESS: 20 Thank you. 21 22 EXAMINATION 23 24 BY ATTORNEY READY: 25 Q. I have some questions for you</p>	<p>1 the 20th? 2 A. Melissa Geary sent me -- she 3 brought up something about it, and 4 then I said what are you talking 5 about? And I -- I asked her for a 6 screenshot of the email and she sent 7 to me. 8 Q. Okay. 9 Have you -- so I believe Ms. 10 O'Donnell asked you, but have you ever 11 talked with the police as a -- as a 12 result of any investigation into your 13 conduct? 14 A. No. 15 Q. Okay. 16 Have you ever been accused of a 17 crime? 18 A. No. 19 Q. Have you ever been charged with 20 a crime? 21 A. No. 22 Q. Have you ever threatened 23 violence against another student? 24 A. No. 25 Q. Okay.</p>
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<p>1 now Jordan. How long were you in the 2 drama program? 3 A. I was in the drama program 4 since 6th grade as a middle schooler, 5 and then I joined the drama program in 6 high school. And I also did community 7 theater in between. 8 Q. What -- what age did you start 9 acting? 10 A. 6th grade. So 12, 13. 11 Q. Okay. 12 What do you want to do in the 13 future with your -- your degree? 14 A. I'm going to be a performer. 15 Q. Okay. 16 Talk -- talk to me about the 17 Newsies. Is this a show -- I 18 understand this might be your favorite 19 show, or one that you really like? 20 A. Yeah, it's a great show. I 21 love it. 22 Q. Okay. 23 How did you first hear about 24 the -- the email we've shown you 25 here, the defamatory email from March</p>	<p>1 I want to turn your attention 2 back to the document, and I'll -- 3 I'll place in front of you what is the 4 level four document you looked at 5 earlier. And I'm going to highlight 6 what we referred to. 7 There was a statement that Ms. 8 O'Donnell asked you about. The 9 threatening school officials, faculty, 10 or staff. Do you understand it to be 11 a level four violation for someone to 12 feel threatened or for someone to be 13 threatened? 14 A. To be threatened. 15 Q. Did you ever threaten Ms. 16 Hartenstine during your interaction 17 with her the night of the School Board 18 meeting? 19 A. No. I asked her a question. 20 Q. Did you ever threaten her, 21 during that time or any other time, 22 with physical violence? 23 A. No. 24 Q. Okay. 25 Did you get in her face?</p>

35 (Pages 134 to 137)

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<p>1 A. No.</p> <p>2 Q. Did you lunge at her?</p> <p>3 A. No.</p> <p>4 Q. Okay.</p> <p>5 I'm going to ask you about the</p> <p>6 video with Jared Mazeika. And I</p> <p>7 should say that the video that ---</p> <p>8 that we've asked about in regards to</p> <p>9 Mr. Mazeika. Did you post that video</p> <p>10 hoping to put him into fear?</p> <p>11 A. No. I didn't post it, and I</p> <p>12 didn't hope to put him in fear.</p> <p>13 Q. Okay.</p> <p>14 Were you aware at the time that</p> <p>15 you did that video that Jared is ---</p> <p>16 is allergic to some --- some fruits?</p> <p>17 A. I knew he was allergic to</p> <p>18 apples.</p> <p>19 Q. Any others?</p> <p>20 A. No.</p> <p>21 Q. Okay.</p> <p>22 When you made that video, did</p> <p>23 you --- did you take the --- the, you</p> <p>24 know, the apple falls whatever it was,</p> <p>25 did you do that in a hope of referring</p>	<p>1 Is that right?</p> <p>2 A. That's correct.</p> <p>3 Q. Okay.</p> <p>4 When did you learn that the ---</p> <p>5 the fruit video was what was being</p> <p>6 referred to?</p> <p>7 A. After I had gotten the text</p> <p>8 from Melissa Geary, I --- I walked to</p> <p>9 literature class. I told my teacher I</p> <p>10 had to go to the guidance counselor.</p> <p>11 I saw the guidance counselor, and she</p> <p>12 said I don't know what I can do for</p> <p>13 you. And so I went to the office.</p> <p>14 And on my up to the office at</p> <p>15 the corner of the hallway, Vinny</p> <p>16 Ferrizzi and Julia Ulsh were walking.</p> <p>17 And they told me that the email ---</p> <p>18 the video was something about fruits.</p> <p>19 And then it clicked in my mind about</p> <p>20 the funny video that I had made with</p> <p>21 it.</p> <p>22 Q. Okay.</p> <p>23 When you were looking for</p> <p>24 somebody in the office or in the</p> <p>25 guidance office, what were you hoping</p>
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<p>1 to Jared?</p> <p>2 A. No. I was just being funny.</p> <p>3 Q. Okay.</p> <p>4 What was your intention with</p> <p>5 that video?</p> <p>6 A. Be funny.</p> <p>7 Q. Okay.</p> <p>8 A. Make Haley laugh.</p> <p>9 Q. Okay.</p> <p>10 Have you ever abused Haley?</p> <p>11 A. No.</p> <p>12 Q. Have you ever tried to control</p> <p>13 her behavior?</p> <p>14 A. No.</p> <p>15 Q. Have you ever kept her from</p> <p>16 eating?</p> <p>17 A. No.</p> <p>18 Q. Okay.</p> <p>19 So as I understand from</p> <p>20 earlier, and I just want to make sure</p> <p>21 to get the timeline right. You</p> <p>22 mentioned that the first time you</p> <p>23 heard about this --- that there was</p> <p>24 some concern about a Snapchat video</p> <p>25 was before the School Board meeting.</p>	<p>1 to accomplish in talking to them about</p> <p>2 it?</p> <p>3 A. I wanted to see if the police</p> <p>4 were called on me for that video</p> <p>5 because of the email that I had read</p> <p>6 off the screenshot.</p> <p>7 Q. Okay.</p> <p>8 When --- when was this video</p> <p>9 posted? Do you recall?</p> <p>10 A. It would've been a Friday or</p> <p>11 Saturday night after Horton Hears a</p> <p>12 Who? Because Haley slept over.</p> <p>13 Q. Okay.</p> <p>14 A. After the show.</p> <p>15 Q. And if you don't remember,</p> <p>16 that's okay. But March 20th was a ---</p> <p>17 was a --- the next Wednesday, or a</p> <p>18 Tuesday? Do you know?</p> <p>19 A. March 20th was a Wednesday I</p> <p>20 believe.</p> <p>21 Q. Okay.</p> <p>22 And as you sit here today, are</p> <p>23 you aware from firsthand knowledge of</p> <p>24 any kind what Jared is allergic to?</p> <p>25 A. I think apples.</p>

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<p>1 Q. Okay.</p> <p>2 Are you aware if he's deathly</p> <p>3 allergic, mildly allergic?</p> <p>4 A. I wasn't aware that he was ---</p> <p>5 I don't ---.</p> <p>6 Q. Today, do you know?</p> <p>7 A. Yeah, I know because we just</p> <p>8 talked about it in this conversation.</p> <p>9 Q. So Counsel ---,</p> <p>10 A. She said ---.</p> <p>11 Q. Ms. O'Donnell has --- has</p> <p>12 represented to you that he's deathly</p> <p>13 allergic to these fruits. But outside</p> <p>14 of this conversation today, have you</p> <p>15 been made aware of the degree of his</p> <p>16 allergic to any of these fruits?</p> <p>17 A. Apples I think. Because I</p> <p>18 would eat apples all the time at</p> <p>19 lunch, and I'd be sure to keep it away</p> <p>20 from him.</p> <p>21 Q. Okay.</p> <p>22 When you spoke at the School</p> <p>23 Board meeting on the night of March</p> <p>24 20th, did you intend to refer to Mrs.</p> <p>25 Lyons by name?</p>	<p>1 A. Just he did. I was intending</p> <p>2 to go back anyway.</p> <p>3 Q. Okay.</p> <p>4 You spoke with Mrs. Mazeika.</p> <p>5 Was it just her, or was it Mr. Mazeika</p> <p>6 as well?</p> <p>7 A. Mr. Mazeika was present, but he</p> <p>8 --- Mrs. Mazeika wouldn't let him say</p> <p>9 anything.</p> <p>10 Q. Okay.</p> <p>11 So you had an interaction with</p> <p>12 her. Do you remember anything she</p> <p>13 said to you?</p> <p>14 A. I told her that, you know, I</p> <p>15 just want to move on with Jared. I</p> <p>16 hope he feels better with whatever</p> <p>17 happened. I asked her, like, who</p> <p>18 called the police and she said that</p> <p>19 guidance recommended that the police</p> <p>20 be called. She wouldn't tell me who</p> <p>21 called.</p> <p>22 She wouldn't tell me really</p> <p>23 anything else when she said that Jared</p> <p>24 really wants to be friends again with</p> <p>25 the things that have happened. And I</p>
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<p>1 A. Yes.</p> <p>2 Q. And the reason that you did not</p> <p>3 was why?</p> <p>4 A. I didn't want them to interrupt</p> <p>5 when I was saying my speech.</p> <p>6 Q. So is that --- you had watched</p> <p>7 them interrupt the others first?</p> <p>8 A. Yeah.</p> <p>9 Q. Okay.</p> <p>10 Did any of the students who</p> <p>11 came from rehearsal speak negatively</p> <p>12 about Mrs. Lyons in anyway?</p> <p>13 A. No. Only the people --- only</p> <p>14 me, Vinny, and Haley.</p> <p>15 Q. Okay.</p> <p>16 You mentioned Dr. Markley. Who</p> <p>17 is Dr. Markley?</p> <p>18 A. He's actually --- he used to be</p> <p>19 the Principal at the high school.</p> <p>20 Q. Okay.</p> <p>21 A. But he's on the School Board</p> <p>22 now.</p> <p>23 Q. Okay.</p> <p>24 Did he or anyone else tell you</p> <p>25 to return to rehearsal?</p>	<p>1 was willing to do that. And in fact,</p> <p>2 when we got back to rehearsal, Jared</p> <p>3 and I hugged.</p> <p>4 Q. Did she state at that time that</p> <p>5 you had called --- that she had called</p> <p>6 the police?</p> <p>7 A. She didn't state at that time</p> <p>8 that she called the police, no.</p> <p>9 Q. Okay.</p> <p>10 Did she act afraid of you?</p> <p>11 A. No, we hugged.</p> <p>12 Q. Did she express any fear for</p> <p>13 Jared's safety in regards to you, tell</p> <p>14 you stay away from Jared?</p> <p>15 A. No, she didn't say any of that.</p> <p>16 Q. Okay.</p> <p>17 In fact, it sounds like she</p> <p>18 encouraged you to reconcile.</p> <p>19 Is that right?</p> <p>20 A. Yeah.</p> <p>21 Q. Okay.</p> <p>22 There's been some testimony</p> <p>23 here today through these documents</p> <p>24 that Ms. O'Donnell's brought up that</p> <p>25 you said to Abby in the meeting</p>

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<p>1 following the School Board meeting 2 that you said that you didn't believe 3 her about her story from 2009. Did 4 you tell her that you didn't believe 5 her? 6 A. I said I had a hard time 7 believing her feelings because mine 8 were so different. And I said this 9 politely. 10 Q. Did Mrs. Lyons tell you that 11 that was inappropriate? 12 A. No. 13 Q. Okay. 14 At any point in this 15 conversation, did Ms. Jones step in 16 and --- and tell you to calm down, 17 back off, say something differently? 18 A. No. 19 Q. Okay. 20 Ms. Hartenstine apparently 21 wrote in this --- this email we have 22 that she felt threatened and 23 disrespected. Did she communicate 24 that to you that night? 25 A. No.</p>	<p>1 recall that you did not say them? 2 A. Some of them I don't remember, 3 and some of them I know I didn't say. 4 Q. Okay. 5 Did you ever state to anybody 6 that night, this isn't over? 7 A. No. 8 Q. Okay. 9 I understand that that day, I 10 believe it was March the 20th, that 11 you were trying to meet with Dr. Shank 12 or Mr. Becker about a video, about 13 this email that was floating. Did you 14 later find out whether --- any reason 15 for their --- their inability to meet 16 with you? 17 A. Dr. Shank had told me, when I 18 was suspended, that she was told by 19 her bosses that she couldn't meet with 20 me. 21 Q. Her bosses being who? Did she 22 specify? 23 A. The School Board. 24 Q. Okay. 25 Who was Dawn Cambria?</p>
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<p>1 Q. Okay. 2 At any point, did anyone in 3 that conversation tell you to calm 4 down, to back up, or put any physical 5 restrictions on you? 6 A. No. 7 Q. Earlier, we were going through 8 some of these documents, these 9 letters, these emails. And several 10 times, Ms. O'Donnell asked if you had 11 any recollection of statements that 12 were attributed to you. And on --- on 13 some of those, you responded you did. 14 Some of them, you said you had no 15 recollection. 16 Does that mean you didn't say 17 those things, or you don't remember? 18 A. For which ones? 19 Q. A number of these statements, 20 she asked you do you have a 21 recollection of saying that. So I 22 guess I'm asking you, do you --- do 23 you know if some of these statements 24 that are attributed to you, are these 25 just things you don't remember or you</p>	<p>1 A. She's the Direct of Student 2 Services. 3 Q. Okay. 4 A. I believe. 5 Q. I'm going to jump around just a 6 little bit here. You were mentioning 7 being President of the Drama Club. 8 Did you --- as part of your duties, 9 did you oversee fundraising or 10 treasury of any kind? 11 A. Not really. I helped in 12 fundraising events. I signed papers 13 as the President saying yes, this 14 amounts okay to go through, but stuff 15 like that. 16 Q. Okay. 17 Did you --- was --- can you 18 characterize the overlap between drama 19 club members and the cast of this 20 show? That is, is it a lot of the 21 same people, is it different people? 22 Can you ---? 23 A. Yeah. 24 Q. Can you clarify that at all? 25 A. So the drama club does two</p>

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<p>1 shows a year, a fall play and a spring 2 musical. So this was for the spring 3 musical. And most of the time, the 4 kids in the fall play do the musical 5 as well. Is that clear enough? 6 Q. Sure. And these --- these are 7 all members of the drama club then? 8 A. Yes. So you have to be a 9 member of drama club to --- 10 Q. To be in either one of these? 11 A. Yes. 12 Q. I see, okay. 13 You ever received a letter from 14 CYS or --- I'm sorry, from --- from 15 Children and Youth Services or from 16 the Berks County District Attorney's 17 Office telling you, you were being 18 investigated for abuse? 19 A. No. 20 Q. You were called down to the 21 office. 22 Is that right? To deal --- to 23 discuss your potential abuse of Haley? 24 A. I was called down, not to the 25 main office, but to Dawn Cambria's</p>	<p>1 A. Uh-huh (yes). 2 Q. So --- sorry, is that a yes? 3 A. Yes. Yes. 4 Q. Okay. 5 So why did you --- I mean, you 6 were this late in the process. You 7 could've waited it out another month 8 probably. Why did you speak at the 9 School Board meeting? 10 A. It became too much to handle, 11 and people stopped talking to me. I 12 lost friends. They just turned a cold 13 shoulder to me because, you know, Mrs. 14 Lyons would spread these rumors to 15 students or Jared. 16 Q. Did you --- did your position 17 as Drama Club President affect your 18 decision at all to testify --- to 19 speak at the School Board meeting? 20 A. Yeah. Because there were other 21 students that were afraid to talk to 22 Mrs. Lyons because she's kind of 23 elitist. She expects a lot of us. 24 And sometimes, it turns really cold 25 and negative. And it's just not good</p>
Page 151	Page 153
<p>1 office. 2 Q. And is that conversation that 3 you discussed earlier? 4 A. With Dr. Shank and Dawn Cambria 5 where they said are you not letting 6 Haley eat? Yes. 7 Q. Okay. 8 What did you hope was going to 9 come out of your statements at the 10 School Board meeting? 11 A. I'd hope that the School Board 12 would do something, and that Mrs. 13 Lyons be supervised. Another person 14 would watch over rehearsals. If it 15 had to come to it, she could've been 16 let go, but I really don't think that 17 would've been the best solution. 18 Q. You spoke at --- you graduated 19 in June, you testified earlier. 20 Is that right? 21 A. Yes. 22 Q. And ---? 23 A. I believe it was June. 24 Q. And this was the end of March. 25 The school show was in April?</p>	<p>1 for the environment and the 2 atmosphere. Because you --- students, 3 especially underclassman, fear 4 retaliation. And in this case, it 5 happened to me and I'm proud it was me 6 and not them. 7 Q. You had been the --- was it the 8 --- what was it? The student 9 representative to the --- to the 10 School Board. 11 Is that right? 12 A. Yeah. 13 Q. So when did that begin? 14 A. The Principal recommended me my 15 junior year. He asked me to do it, 16 represent the students. 17 Q. So you did it for two years? 18 A. Yes. I did it as a junior and 19 as a senior. 20 Q. Did you go to every School 21 Board meeting? 22 A. Not every School Board meeting, 23 no. Most of them. I would miss a 24 portion of rehearsal and then go to 25 rehearsal right after I said my speech</p>

39 (Pages 150 to 153)

Page 154	Page 156
<p>1 as the representative. But sometimes 2 I had to miss because of soccer games 3 or because of the show, if we had a 4 performance in tech week. 5 Q. How often were you there? 6 A. At School Board meetings? 7 Q. Yes. 8 A. I was at more of them than I 9 wasn't at. So I attended the majority 10 of them. 11 Q. Are these monthly meetings? 12 A. Yes, on Wednesdays. 13 Q. Okay. 14 So why didn't you ever speak 15 about your concerns before in ---? 16 17 (WHEREUPON, THERE WAS A BRIEF 18 INTERRUPTION DURING THE PROCEEDING.) 19 20 THE WITNESS: 21 Why hadn't I spoken at 22 the meeting before-hand? 23 BY ATTORNEY READY: 24 Q. Yes. Why hadn't you spoken 25 before the March 20th meeting about</p>	<p>1 The night of March 20th, you 2 met with Mrs. Lyons in the hallway. 3 As I understand it from your 4 discussion earlier, you initiated that 5 meeting. 6 Is that correct? 7 A. That's correct. 8 Q. And what was your purpose in 9 --- in that meeting? 10 A. To kind of clear the air, move 11 on with the show, talk through 12 problems and hopefully come up with a 13 solution, which was very difficult 14 because we couldn't really agree on 15 anything. Like I said earlier, we 16 said that we had to agree to disagree. 17 And when I asked questions, 18 sometimes she'd be like, I don't know 19 what you're talking about. And at one 20 point I said that, and I turned to 21 Mrs. Jones. And then I said, then 22 it's her word against mine. How are 23 we going to fix this? 24 Q. Okay. 25 So the next day, you were at</p>
Page 155	Page 157
<p>1 this specific issue? 2 A. This specific issue regarding 3 Mrs. Lyons' direction? 4 Q. Yeah, Mrs. Lyons --- 5 A. Because --- 6 Q. --- the school show, any of 7 these concerns that you brought you. 8 Why hadn't you brought these up before 9 the School Board? 10 A. Well they had been kind of 11 happening since sophomore year, but I 12 was afraid to tell her because I 13 didn't --- I didn't want her to be, 14 like, give me the cold shoulder like 15 she had given other students who had 16 maybe thought differently from her and 17 that voiced that. 18 And then they just, you know, 19 never got a lead role again or they 20 just kind of faced bad things from 21 her. Cold shoulders, nasty looks. So 22 I didn't want to go against her 23 because I wanted to do the best job I 24 could in the shows. 25 Q. Okay.</p>	<p>1 school and you were called down to the 2 office for a meeting with Dr. Shank 3 and Mr. Becker. What happened at that 4 meeting? 5 ATTORNEY O'DONNELL: 6 Counsel, we've been over 7 this testimony. I --- I don't 8 mind you following up with 9 specifics, but having him re- 10 testify to something that we've 11 just covered exhaustively is 12 kind of a waste of time, and we 13 are --- we are under some time 14 constraints in this room. 15 ATTORNEY READY: 16 Yeah. I mean, I --- I'd 17 like to back --- circle back, 18 and it's an important meeting. 19 I think we've covered it, a 20 couple pieces. But I'd like to 21 --- 22 ATTORNEY O'DONNELL: 23 But you're --- because 24 you're witnessing --- 25 THE WITNESS:</p>

40 (Pages 154 to 157)

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<p>1 Definitely more 2 happened. 3 ATTORNEY O'DONNELL: 4 Your --- he's your 5 witness, and you're asking him 6 open ended questions. I mean, 7 I --- I don't think it's 8 appropriate, but go ahead. 9 ATTORNEY READY: 10 I can be more leading if 11 that's what you're asking. 12 ATTORNEY O'DONNELL: 13 I think you need to be 14 more pointed with your 15 questions and not --- and not 16 re-cover the same grounds we've 17 already covered. We have a 18 transcript you can refer back 19 to. 20 ATTORNEY READY: 21 Okay. 22 BY ATTORNEY READY: 23 Q. At that meeting, Dr. Shank and 24 Mr. Becker both addressed you. 25 Is that right?</p>	<p>1 that form? Did you observe? 2 A. Toward the end of the meeting. 3 Q. Okay. 4 They told you that they wished 5 that you'd gone home after the School 6 Board meeting? 7 A. Yeah. One of those things Dr. 8 Shank said was that. She wished I 9 would've gone home instead of going to 10 rehearsal. 11 Q. Okay. 12 Did she say why? 13 A. Due to the circumstances I 14 assume. 15 Q. Did --- I mean, did she say 16 anything about why? 17 A. Not that I can recall. 18 Q. When she said that you had 19 lunged at Ms. Hartenstine, did you 20 respond to that? 21 A. I was very confused, and she 22 demonstrated and stood up over me and 23 got close to me and said that I did 24 --- she said you did this, and I was 25 like, okay. I didn't. I think Abby's</p>
Page 159	Page 161
<p>1 A. That's correct. 2 Q. And what did they say? 3 A. They said that --- that she 4 needs to protect her teachers, and 5 that I --- Abby felt threatened by my 6 question to her. And she said that I 7 lunged at her. And I was like, I 8 didn't do that. 9 Q. I'm sorry, and she being Dr. 10 Shank said that --- 11 A. Yes. 12 Q. --- Abby said that about you? 13 A. Yes. 14 Q. Okay. 15 Did she say it what form that 16 Abby had related that to her? 17 A. Through email. 18 Q. Okay. 19 What was --- I understand Mr. 20 Becker was filling a suspension form 21 during the meeting. 22 Is that right? 23 A. Yeah. That's kind of all he 24 did. He was just sitting there. 25 Q. When did he begin filling out</p>	<p>1 a great person and I even offered to 2 write her an apology, but --- and I 3 said I --- I could do that. 4 And I --- and they said I would 5 have to write it and send it to them 6 so that they can look over it before 7 it's sent to Abby. I never did this 8 though because I realized that I never 9 intended to threaten Abby and I never 10 lunged at her. 11 Q. During this time, Dr. Shank 12 told you that --- that she had to calm 13 Abby Hartenstine down so she could 14 drive home. 15 Is that correct? 16 A. Yeah. So she said that around 17 10:00 p.m. she was there, and Abby was 18 crying for so long that she stayed 19 until midnight so that Abby could 20 safely drive home. 21 Q. Okay. 22 At the --- at the meeting, did 23 they define that it was a level three 24 or level four offense? 25 A. They didn't define it, but they</p>

41 (Pages 158 to 161)

Page 162	Page 164
<p>1 said it was a level three or four. 2 Q. So they did tell you at that 3 time that it was a level or level four 4 offense? 5 A. Yeah. 6 Q. Okay. 7 Did they give you the 8 opportunity to speak to Mrs. 9 Hartenstine at this meeting? 10 A. No. 11 Q. Did they give you the 12 opportunity to present any witnesses 13 in your defense? 14 A. I believe they let my mom sit 15 with me. 16 Q. Okay. 17 A. She was there. 18 Q. Were you able to present any of 19 the witnesses from that --- from that 20 night? From the night before? 21 A. No. 22 Q. Okay. 23 Did they bring Mrs. Hartenstine 24 in to speak? 25 A. No.</p>	<p>1 A. Yes. 2 Q. Okay. 3 And what --- what is this? 4 A. This is a letter to looks like 5 my parents saying that I'd been 6 suspended for a period of three days 7 due to disrespect/insubordination. 8 Q. Okay. 9 Did you have any prior 10 suspensions or school discipline? 11 A. No. 12 Q. Okay. 13 Do you have an IEP? 14 A. No. 15 Q. Okay. 16 In this process, you've 17 mentioned some of the damages you've 18 suffered. You mentioned losing some 19 of your friends. Can you tell about 20 other --- other effects that this has 21 had on you? 22 A. Yeah. There's been online 23 bullying. I've had to go to the 24 bathroom a lot, like over the course 25 of a lot of these --- these meetings</p>
Page 163	Page 165
<p>1 Q. Okay. 2 Did they show you any footage 3 from the security cameras in the 4 hallways? 5 A. No. 6 Q. Okay. 7 I'm going to show you this 8 document, which we'll mark --- I'm not 9 sure which number we're on here, but 10 6. 11 All right. 12 We're on document 6. 13 --- 14 (Whereupon, Plaintiff's 15 Exhibit 7, Suspension 16 Letter, was marked for 17 identification.) 18 --- 19 BY ATTORNEY READY: 20 Q. Do you recognize this document? 21 A. Wait. This is 7. 22 Q. I'm sorry. This is 7. I 23 apologize. So just the front page of 24 this document. Do you recognize this 25 --- this front --- this page?</p>	<p>1 with people. I've been called out of 2 class a lot, I missed a lot of school. 3 I missed work for a few days because I 4 just didn't feel well. 5 I'd often be afraid of the 6 phone ringing because that would often 7 mean, around 9:00 a.m., that I would 8 have to go down and speak to somebody 9 about something. 10 Q. Can you talk about the impact 11 of missing your senior year play? 12 A. Because it's what I want to do 13 with my life, and it's a great show. 14 I was really disappointed that I 15 couldn't be a part of it. 16 Q. Did you ---? 17 A. There was also a scholarship, 18 the drama club scholarship that was 19 never --- it never happened that I 20 applied for. That happened previous 21 years, and it was for \$2,000. That 22 was --- I filled out the whole 23 application and it never --- never 24 heard anything. 25 Q. What scholarship is that?</p>

42 (Pages 162 to 165)

<p style="text-align: right;">Page 166</p> <p>1 A. The scholarship is for a 2 student going to the performing arts. 3 Q. Is it Oley Valley specific? 4 A. Yes. 5 Q. Okay. 6 Who were the other seniors that 7 would've been eligible for -- for 8 that? 9 A. The other seniors eligible 10 would've been Jared Mazeika, Haley 11 Hartline, possibly Haley Richard. 12 Q. Okay. 13 Do you know if the scholarship 14 was awarded to any of them? 15 A. No. There was no scholarship 16 given. 17 Q. All right. 18 Two of the questions about the 19 suspension meeting that you had with 20 Dr. Shank and Mr. Becker, was there 21 anyone else present in that meeting? 22 A. My mom. 23 Q. Okay. Okay. 24 ATTORNEY READY: 25 I believe that's all my</p>	<p style="text-align: right;">Page 168</p> <p>1 COMMONWEALTH OF PENNSYLVANIA) 2 COUNTY OF BERKS) 3 CERTIFICATE 4 I, Ian Weeber, a Notary Public in and 5 for the Commonwealth of Pennsylvania, do 6 hereby certify: 7 That the witness, Jordan Eck, whose 8 testimony appears in the foregoing deposition, 9 was duly sworn by me on 09/26/2019 and that 10 the transcribed deposition of said witness is 11 a true record of the testimony given by said 12 witness; 13 That the proceeding is herein recorded 14 fully and accurately; 15 That I am neither attorney nor counsel 16 for, nor related to any of the parties to the 17 action in which these depositions were taken, 18 and further that I am not a relative of any 19 attorney or counsel employed by the parties 20 hereto, or financially interested in this 21 action. 22 Dated the 6th day of November, 2019 23 <i>Sign Ian Weeber</i> 24 Ian Weeber, 25 Court Reporter</p>
<p style="text-align: right;">Page 167</p> <p>1 questions. 2 ATTORNEY O'DONNELL: 3 No questions. Thank you 4 very much. 5 THE WITNESS: 6 Thank you. 7 COURT REPORTER: 8 Counsel would like a 9 transcript? 10 ATTORNEY O'DONNELL: 11 Yes. 12 ATTORNEY READY: 13 Yes. 14 ATTORNEY O'DONNELL: 15 All of mine electronic, 16 please. 17 COURT REPORTER: 18 Yes. 19 ***** 20 DEPOSITION CONCLUDED AT 4:18 P.M. 21 ***** 22 23 24 25</p>	

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT
OF PENNSYLVANIA

* * * * *

JORDAN ECK, HALEY *
HARTLINE, and * Case No.
VINCENT FERRIZZI, * 5:19-CV-1873-MAK
Plaintiffs *
vs. *
OLEY VALLEY SCHOOL *
DISTRICT; TRACY *
SHANK, individually; *
CHRISTOPHER M. *
BAKER, individually; *
and STACY LYONS, *
individually, *
Defendants *

* * * * *

DEPOSITION OF
HALEY HARTLINE
September 26, 2019

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the certifying agency.

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<p>1 DEPOSITION</p> <p>2 OF</p> <p>3 HALEY HARTLINE, taken on behalf of the</p> <p>4 Defendants herein, pursuant to the</p> <p>5 Rules of Civil Procedure, taken before</p> <p>6 me, the undersigned, Ian Dale Weeber,</p> <p>7 a Court Reporter and Notary Public in</p> <p>8 and for the Commonwealth of</p> <p>9 Pennsylvania, at Berks County Bar</p> <p>10 Association, 544 Court Street,</p> <p>11 Reading, Pennsylvania, on Thursday,</p> <p>12 September 26, 2019 beginning at 11:51</p> <p>13 a.m.</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 I N D E X</p> <p>2</p> <p>3 WITNESS: HALEY HARTLINE</p> <p>4 EXAMINATION</p> <p>5 By Attorney O'Donnell 7 - 109</p> <p>6 EXAMINATION</p> <p>7 By Attorney Ready 110 - 122</p> <p>8 CERTIFICATE 123</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
Page 3	Page 5
<p>1 A P P E A R A N C E S</p> <p>2</p> <p>3 JOEL A. READY, ESQUIRE</p> <p>4 Cornerstone Law Firm, LLC</p> <p>5 8500 Allentown Pike</p> <p>6 Suite 3</p> <p>7 Blandon, PA 19510</p> <p>8 COUNSEL FOR PLAINTIFFS</p> <p>9</p> <p>10 SHARON M. O'DONNELL, ESQUIRE</p> <p>11 Marshall, Dennehey, Warner, Coleman &</p> <p>12 Goggin, P.C.</p> <p>13 100 Corporate Center Drive</p> <p>14 Suite 201</p> <p>15 Camp Hill, PA 17011</p> <p>16 COUNSEL FOR DEFENDANTS</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 EXHIBIT PAGE</p> <p>2</p> <p>3</p> <p>4</p> <p>5 NUMBER DESCRIPTION PAGE</p> <p>6 P-2 District Court IDENTIFIED</p> <p>7 Complaint 13</p> <p>8 P-3 Defamatory Email 34</p> <p>9 P-4 Musical Production</p> <p>10 Team Expectations</p> <p>11 Letter 106</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p style="text-align: right;">Page 6</p> <p>1 OBJECTION PAGE</p> <p>2</p> <p>3 ATTORNEY PAGE</p> <p>4 NONE MADE</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 8</p> <p>1 that your constitutional rights were</p> <p>2 violated and alleging that they</p> <p>3 conspired against you to cause harm.</p> <p>4 And so, I am going to ask you</p> <p>5 some questions about the lawsuit and</p> <p>6 about the facts giving rise to what</p> <p>7 you consider to be constitutional</p> <p>8 violations and so torts. In -- in</p> <p>9 our legalese, a tort is a civil wrong</p> <p>10 doing, meaning that people that you're</p> <p>11 accusing of doing this wrong thing</p> <p>12 intentionally tried to harm you.</p> <p>13 So I am going to start by</p> <p>14 giving you some instructions about</p> <p>15 answering my questions. And the first</p> <p>16 is to make sure that when I ask you a</p> <p>17 question, you understand what that</p> <p>18 question is. You'll have to ask me to</p> <p>19 repeat it you don't hear it, if you</p> <p>20 zone out for a minute, or ask me to</p> <p>21 rephrase it if you don't understand</p> <p>22 the way I'm asking it because if you</p> <p>23 answer a question that I ask, I'm</p> <p>24 going to assume that you both heard it</p> <p>25 and understood it, and that the answer</p>
<p style="text-align: right;">Page 7</p> <p>1 STIPULATION</p> <p>2</p> <p>3 (It is hereby stipulated and agreed by</p> <p>4 and between counsel for the respective</p> <p>5 parties that reading, signing,</p> <p>6 sealing, certification and filing are</p> <p>7 waived.)</p> <p>8</p> <p>9 PROCEEDINGS</p> <p>10</p> <p>11 HALEY HARTLINE,</p> <p>12 CALLED AS A WITNESS IN THE FOLLOWING</p> <p>13 PROCEEDING, AND HAVING FIRST BEEN DULY</p> <p>14 SWORN, TESTIFIED AND SAID AS FOLLOWS:</p> <p>15</p> <p>16 EXAMINATION</p> <p>17</p> <p>18 BY ATTORNEY O'DONNELL:</p> <p>19 Q. Good afternoon, Ms. Hartline.</p> <p>20 My name is Sharon O'Donnell. I</p> <p>21 represent the Oley Valley School</p> <p>22 District, Dr. Shank, Mr. Becker, and</p> <p>23 Ms. Stacy Lyons in a lawsuit that --</p> <p>24 lawsuit that you brought along with</p> <p>25 two other people against them alleging</p>	<p style="text-align: right;">Page 9</p> <p>1 that you need to -- the answer that</p> <p>2 you give me is the answer that you</p> <p>3 mean to give me.</p> <p>4 Okay?</p> <p>5 A. Okay.</p> <p>6 Q. That fair?</p> <p>7 A. Uh-huh (yes).</p> <p>8 Q. Also because this is a</p> <p>9 proceeding that's being transcribed</p> <p>10 into a booklet form by the Court</p> <p>11 Reporter, you'll have to keep your</p> <p>12 answers audible and verbal. Audible</p> <p>13 because we have, especially today,</p> <p>14 because we have an air conditioner</p> <p>15 directly behind us and you'll have to</p> <p>16 try to compete with that air</p> <p>17 conditioner when you're giving your</p> <p>18 answers. And verbal because we need</p> <p>19 to transcribe your answers into a book</p> <p>20 -- booklet form and a Court Reporter</p> <p>21 is not required to transcribe your</p> <p>22 physical gestures.</p> <p>23 Okay?</p> <p>24 So as your nodding your head</p> <p>25 now, you'll need to remember to try to</p>

3 (Pages 6 to 9)

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<p>1 say yes if it's an answer in the 2 affirmative or a no if it's not. 3 Okay? 4 A. Okay. 5 Q. All right. 6 A. Sorry. 7 Q. If you don't know the answer to 8 one of my questions, you could just 9 say I don't know and that's a fair 10 response. 11 A. Okay. 12 Q. If you don't recall the answer 13 to a question that I ask you, simply 14 tell me you don't recall. If, by the 15 time we finish, you remember the 16 answer to that question, you can 17 interrupt the process or add on to 18 your testimony once you've remembered. 19 Okay? 20 A. Okay. 21 Q. Is there any reason that you 22 cannot give accurate and truthful 23 testimony this morning -- today? 24 A. No. None. 25 Q. Do you understand what it means</p>	<p>1 A. It's 95 Valley View Trailer 2 Park, Reading, PA. 3 Q. And what is your date of birth? 4 A. May 10th, 2001. 5 Q. And how old are you currently 6 today? 7 A. I'm 18. 8 Q. Are you attending college? 9 A. Yes I am. 10 Q. At where? 11 A. Reading Area Community College. 12 Q. And what's your major? 13 A. Liberal Arts Transfer. 14 Q. When did you start at Reading 15 Area Community College? 16 A. I believe it was August 26. 17 Q. And when did you finish with 18 Oley Valley School District? 19 A. June 6th. 20 Q. Now if you would please turn to 21 the first page of the booklet that's 22 in front of you, to the exhibit that's 23 marked number one and hand it to our 24 Court Reporter so that he can mark it 25 as Plaintiff 2.</p>
Page 11	Page 13
<p>1 to be under oath? 2 A. Yes. 3 Q. What does it mean? 4 A. I have to tell the truth and 5 the whole truth. And that's ---. 6 Q. Okay. 7 Do you know what -- do you 8 know what the truth is? 9 A. Yes. Anything that actually 10 happened and it's not falsified, or 11 like learned from other people. 12 Q. Do you know what perjury is? 13 A. No. 14 Q. Okay. 15 Perjury is a crime that's 16 committed when false testimony is 17 given and people, like lawyers and 18 Judges, have no choice but to rely on 19 it. That causes problems so we're 20 trying to avoid that. 21 Do you understand that? 22 A. Yes. 23 Q. Okay. 24 Would you give me your current 25 address, please?</p>	<p>1 A. This one? 2 COURT REPORTER: 3 Just slide it over. 4 THE WITNESS: 5 Okay. 6 7 (Whereupon, Plaintiff's 8 Exhibit 2, District 9 Court Complaint, was 10 marked for 11 identification.) 12 13 BY ATTORNEY O'DONNELL: 14 Q. Okay. 15 Have you seen this document 16 before today? 17 A. Yes. 18 Q. If you read with me, turn to 19 page 3 and at paragraph 14, it 20 indicates that Jordan and Haley were 21 dating. 22 Is that true as of today? 23 A. Yes. 24 Q. Okay. 25 And why is that important to</p>

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<p>1 your law suit?</p> <p>2 A. Because at --- while we were</p> <p>3 dating, Jordan got accused of abusing</p> <p>4 me which was completely false. And we</p> <p>5 think that it was meant to ill, like</p> <p>6 --- to harm his like, the view of him.</p> <p>7 Trying to like make --- sorry.</p> <p>8 Trying to make him come out to be a</p> <p>9 bad person when he's not.</p> <p>10 Q. So was there a complaint of</p> <p>11 something that lead someone in the</p> <p>12 school district to believe that Jordan</p> <p>13 was abusing you?</p> <p>14 A. Well my one friend said --- had</p> <p>15 told Mrs. Lyons that I was losing</p> <p>16 weight, and that she was worried about</p> <p>17 me and to keep an eye on me. And then</p> <p>18 Mrs. Lyons went to the Superintendent,</p> <p>19 Dr. Shank, to say that Jordan was</p> <p>20 abusing me.</p> <p>21 Q. Okay.</p> <p>22 Did --- who was your friend</p> <p>23 that went to Mrs. Lyons?</p> <p>24 A. Alexa Henry.</p> <p>25 Q. And do you know what Alexa said</p>	<p>1 Q. Okay.</p> <p>2 And --- and were the parts for</p> <p>3 the musical chosen around Christmas</p> <p>4 time?</p> <p>5 A. It was after Christmas.</p> <p>6 Q. After Christmas? So it</p> <p>7 would've been in January of 2019 that</p> <p>8 the characters were chosen for the</p> <p>9 parts?</p> <p>10 A. Yes.</p> <p>11 Q. So what --- you were chosen for</p> <p>12 a part then, Haley?</p> <p>13 A. Uh-huh (yes).</p> <p>14 Q. And what --- what part were you</p> <p>15 chosen for?</p> <p>16 A. I was given Finch.</p> <p>17 Q. Finch. And what part was</p> <p>18 Jordan given?</p> <p>19 A. He was given the part of Race.</p> <p>20 Q. Okay.</p> <p>21 And ---.</p> <p>22 A. Do you --- do you want to know</p> <p>23 our understudy parts also?</p> <p>24 Q. You were an understudy for</p> <p>25 someone?</p>
Page 15	Page 17
<p>1 to Mrs. Lyons specifically?</p> <p>2 A. Not specifically. I just know</p> <p>3 that she had talked about that I was</p> <p>4 losing a lot of weight. She was</p> <p>5 worried about me, and she just wanted</p> <p>6 Mrs. Lyons to keep an eye on me.</p> <p>7 Q. Were you --- were you in the</p> <p>8 drama club at that time?</p> <p>9 A. Yes.</p> <p>10 Q. And was Jordan in the drama</p> <p>11 club at that time?</p> <p>12 A. Yes.</p> <p>13 Q. And was drama club active even</p> <p>14 if a play was not going on?</p> <p>15 A. Well, we have a play and then a</p> <p>16 musical right after. So it --- yes,</p> <p>17 it was pretty much for the whole year.</p> <p>18 Q. Okay.</p> <p>19 So if --- if we're --- if we're</p> <p>20 thinking about February of 2019, would</p> <p>21 that have been at the time when a play</p> <p>22 was ongoing?</p> <p>23 A. The musical, yes.</p> <p>24 Q. The musical was ongoing?</p> <p>25 A. Uh-huh (yes).</p>	<p>1 A. Yes.</p> <p>2 Q. Who was that?</p> <p>3 A. Jordan --- Meadow Larken.</p> <p>4 Q. Okay.</p> <p>5 A. And he was an understudy for</p> <p>6 Jack Kelly and Davey.</p> <p>7 Q. Okay.</p> <p>8 And what part did Alexa have?</p> <p>9 A. Alexa was not in the show. She</p> <p>10 graduated the year before.</p> <p>11 Q. When did Alexa have an</p> <p>12 opportunity to speak with Mrs. Lyons?</p> <p>13 A. Over the phone.</p> <p>14 Q. So Alexa specifically called</p> <p>15 Mrs. Lyons to watch you?</p> <p>16 A. I believe so. I'm not 100</p> <p>17 percent sure on that.</p> <p>18 Q. Did Alexa tell you that she</p> <p>19 spoke to Mrs. Lyons on your behalf?</p> <p>20 A. Yes.</p> <p>21 Q. Did Mrs. Lyons tell you that</p> <p>22 Alexa spoke to her?</p> <p>23 A. No.</p> <p>24 Q. Is it possible that Alexa could</p> <p>25 have said more? Just that more than</p>

5 (Pages 14 to 17)

Page 18	Page 20
<p>1 you're --- is it --- strike that. Is 2 it possible that Alexa could've said 3 more than or just that you were losing 4 weight? 5 A. I do not know. 6 Q. How much time did you spend 7 with Alexa outside of school? 8 A. Not much time. We would 9 occasionally hang out like every other 10 weekend because she was in college at 11 the time. 12 Q. Okay. 13 Did Alexa know Jordan? 14 A. Yes. 15 Q. Okay. 16 And do you know how much time 17 she spent with Jordan? 18 A. Outside of school? 19 Q. Yes. 20 A. No. 21 Q. Did you spend any time with 22 Alexa's parents? 23 A. Only when I was at Alexa's 24 house and they were around. But I 25 never spent, like individual time with</p>	<p>1 So you were in his house every 2 day until you left to go to rehearsal? 3 A. Yes. 4 Q. Where --- did you also go to 5 his house even when there was no 6 rehearsal? 7 A. Occasionally. 8 Q. Okay. 9 How many days a week would you 10 say you would be at Jordan's house on 11 an average basis? 12 A. Four or five. 13 Q. Okay. 14 Were you at his house on 15 weekends as well? 16 A. Occasionally. 17 Q. Okay. 18 A. I sometimes worked. 19 Q. Okay. 20 And how far away did you live 21 from Jordan's house? 22 A. About eight minutes away. 23 Q. Okay. 24 Is that eight minutes walking 25 or driving?</p>
Page 19	Page 21
<p>1 them. 2 Q. Okay. 3 And what about Jordan? Did he 4 spend any time with Alexa's parents? 5 A. No. 6 Q. I read some documentation that 7 you spent a lot of time at Jordan's 8 house. 9 Is that correct? 10 A. Yes. 11 Q. Okay. 12 When you were in your senior 13 year, did you live at his house? 14 A. I did not live there, but I 15 would like, sleepover occasionally. 16 Q. Okay. 17 So how much time did you spend 18 at Jordan's house during your senior 19 year? 20 A. Well I would usually go to his 21 house after school, and then we would 22 go to the musical rehearsals together. 23 And then, after we got home, I would 24 go back to my house. 25 Q. Okay.</p>	<p>1 A. Driving. 2 Q. Okay. 3 And the sleepovers, they were 4 acceptable to your parents and his 5 parents? 6 A. Yep. 7 Q. Okay. 8 A. Yeah, we would sleep in 9 different rooms. 10 Q. It says in here that Jordan was 11 elected President of the drama club, 12 and served as --- 13 A. Yeah. 14 Q. --- Vice President previous two 15 years. 16 Is that correct? 17 A. Yes. 18 Q. Okay. 19 And in paragraph 18, it says 20 both students, that's you and Jordan 21 I'm assuming, and their parents 22 expressed at various times concerns 23 about Mrs. Lyons leadership of the 24 school play. These concerns were 25 raised to other students and</p>

6 (Pages 18 to 21)

Page 22	Page 24
<p>1 ultimately the school administration 2 who declined to act. 3 Do you see that? 4 A. Yes. 5 Q. Okay. 6 What concerns did you express 7 --- did you personally express about 8 Mrs. Lyons leadership of the school 9 play, and to whom? 10 A. I expressed to the School Board 11 that she was very unprofessional with 12 us and she would never start on a 13 timely manner. Things were always 14 changing. And she was very rude to 15 the students occasionally. 16 Q. Always or occasionally? 17 A. Occasionally. 18 Q. And other than the --- so that 19 was --- you told the School Board all 20 of that? She was unprofessional, 21 untimely, changed things a lot, and 22 occasionally rude? Yes? 23 A. Yes. Sorry. 24 Q. Okay. 25 Did you tell that to anyone</p>	<p>1 speaking about his concerns regarding 2 Mrs. Lyons. 3 Do you see that? 4 A. On the 19th? 5 Q. Yes. 6 A. Yes. 7 Q. Do you know to whom he 8 expressed his interests? 9 A. He expressed his interest to 10 Mr. Becker, to his parents. 11 Q. Okay. 12 Do you know what he 13 specifically said to Mr. Becker? 14 A. I do not. 15 Q. When did you make the decision 16 to make a statement to the School 17 Board? 18 A. I do not know. Like, 19 specifically when. It was a little 20 --- a little bit before the whole 21 event happened. 22 Q. Before the School Board 23 meeting? 24 A. Yep. 25 Q. Do you know why you chose to</p>
Page 23	Page 25
<p>1 else? 2 A. Other than ---? 3 Q. Adults. 4 A. Adults? No. 5 Q. So it was just that one time 6 that you expressed to the School Board 7 those complaints that you had about 8 Mrs. Lyons? 9 A. To adults, yes. 10 Q. Okay. 11 And then, what about your 12 parents? Did they express any 13 concerns about Mrs. Lyons leadership 14 of the school play to anyone? 15 A. No. No. My parents are 16 usually very busy. They always work a 17 lot. My mom had attended the School 18 Board meeting, but she did not say 19 anything. 20 Q. Okay. 21 At the top of page 4, it says 22 in the days leading up to the March 23 20th, 2019 School Board meeting, 24 Jordan expressed his interest in 25 attending the School Board meeting and</p>	<p>1 speak? 2 A. Yes. 3 Q. Why? 4 A. Because she was very 5 unprofessional. She had accused my 6 boyfriend of abusing me for no reason. 7 It was false accusations, and I felt 8 that she needed oversight. 9 Q. Did she --- was she 10 unprofessional with you specifically? 11 A. Yes. 12 Q. Okay. 13 And in what way? 14 A. Once I had arrived late to a 15 rehearsal, and when I went on stage, I 16 was at --- I was practicing with 17 everyone for about ten minutes. And 18 then, she called me off stage and put 19 me in like a time out. And just had 20 me sit there, watching everyone 21 practice. 22 And then she came up to me and 23 said that I had to be on time more, 24 which I understand. And then she said 25 that I was not allowed to question the</p>

7 (Pages 22 to 25)

Page 26	Page 28
<p>1 authority of the production team. 2 Q. Okay. 3 Anything else? 4 A. The whole abuse thing. 5 Q. When she said you were not 6 allowed to question the authority of 7 the production team, what was that 8 about? 9 A. The choreographer was very 10 unprofessional, and he was never 11 prepared so we had a lot of concerns 12 about it and the show. 13 Q. Did you speak out against the 14 choreographer to someone? 15 A. No. Only to like --- like a 16 couple of students, but they had 17 expressed the same concerns. 18 Q. So you expressed concerns about 19 the choreographer never being prepared 20 to other students? 21 A. Yes. 22 Q. And how did that get onto the 23 radar of Mrs. Lyons? 24 A. I don't know. 25 Q. But you were sure when she said</p>	<p>1 ATTORNEY READY: 2 Is it okay if we turn 3 off the air? I think she's 4 cold. So you're okay if we 5 turn it off, or ---? 6 ATTORNEY O'DONNELL: 7 Okay. Sure. 8 ATTORNEY READY: 9 Okay. 10 THE WITNESS: 11 Sorry. 12 ATTORNEY READY: 13 If you get hot, let me 14 know. We'll --- we'll turn it 15 back on then. 16 ATTORNEY O'DONNELL: 17 Thank you. 18 BY ATTORNEY O'DONNELL: 19 Q. Do you feel that you had a 20 right to question the authority of the 21 production team? 22 A. Yes. 23 Q. Okay. 24 And where would you have 25 obtained that right to question the</p>
Page 27	Page 29
<p>1 you were not allowed to question the 2 authority of the production team, I'm 3 assuming the choreographer is part of 4 the production team? 5 A. Yes. 6 Q. And someone told her that you 7 were one of a group of students that 8 --- that questioned his competency? 9 A. I don't know, but most likely. 10 Q. So when she told you you're not 11 allowed to question the authority of 12 the production team, you assumed she 13 was talking about the choreographer? 14 A. And just the whole production 15 team in general, yes. 16 Q. Did you make a habit of 17 questioning the authority of the 18 production team? 19 A. No. 20 Q. Other than the choreographer, 21 did you express or question the 22 authority of any other member of the 23 production team? 24 A. Only Mrs. Lyons at the School 25 Board meeting.</p>	<p>1 authority of the production team? 2 A. I don't understand that 3 question. 4 Q. How do you know you have a 5 right to question the authority of the 6 production team? 7 A. Because I have rights through 8 my --- my Bill of Rights that applies 9 to everyone. I'm allowed to free 10 speech, free think. 11 Q. Well --- okay. 12 Are you aware that there are 13 restrictions on the right to speak 14 freely in this country? 15 A. No I'm not aware of that. 16 Q. Okay. 17 A. You mean like slandering people 18 on ---? 19 Q. No, not like slandering people. 20 Nope. We're talking about 21 constitutional rights. Do you know 22 which amendment that is? 23 A. The 1st Amendment. 24 Q. Correct. 25 So there's a 1st Amendment,</p>

8 (Pages 26 to 29)

Page 30	Page 32
<p>1 right to speak freely. Right, you 2 know that? 3 A. Yes. 4 Q. And I know that. I know that 5 there's a --- there are some 6 restrictions on a person's right to 7 speak freely, but you don't know that. 8 Is that correct? 9 A. Yes. 10 Q. Okay. 11 So if the school district were 12 to have placed some restrictions on 13 your speech at the School Board 14 meeting, you don't know whether or not 15 those restrictions are constitutional 16 or legal. 17 Right? You don't know one way 18 or the other? 19 A. Yes, but I feel that it is a 20 violation of my 1st Amendment. 21 Q. Well --- but not if they have a 22 right to restrict your speech. 23 Right? 24 A. I suppose. 25 Q. Okay.</p>	<p>1 A. Yes. I did not receive it, but 2 I have --- I was shown it by Jordan 3 who received it from another student. 4 Q. Do you know who gave it to 5 Jordan? 6 A. I do not. 7 Q. Do you know if Jordan's name 8 was on that email? 9 A. It was. 10 Q. It was? 11 A. Well, I'm pretty sure it was. 12 Q. Okay. 13 A. I have not seen the email 14 recently. 15 Q. Okay. 16 If --- do you know whether the 17 email was directed to Jordan? 18 A. Yes, it was. 19 Q. It was directed to Jordan? 20 A. Yes. 21 Q. Okay. 22 Let's take a look --- 23 A. I remember. It did not say his 24 name specifically, but it said that a 25 student who did not receive the lead</p>
Page 31	Page 33
<p>1 So if they had a right to 2 restrict your speech, you would not 3 have a violation to your 1st Amendment 4 rights imposed. 5 Right? 6 A. I suppose. 7 Q. It says in paragraph 20, on 8 March 19th, having learned that Jordan 9 would be speaking at the meeting and 10 in anticipation of this event, Mrs. 11 Lyons, with the apparent approval of 12 Dr. Shank, the Superintendent for Oley 13 Valley, sent a defamatory email to the 14 parents of other students in the drama 15 club, alleging that Jordan and his 16 mother were making problems for the 17 school show and that Jordan would be 18 attending the March 20th School Board 19 meeting to speak out against Mrs. 20 Lyons. 21 Did I read that correctly? 22 A. Yes. 23 Q. Okay. 24 Do you know anything about that 25 email?</p>	<p>1 role, which is Jack Kelly and only two 2 students had auditioned for it so it 3 was directed towards him, but it did 4 not say his name. 5 Q. Okay. 6 Because of student who did not 7 receive the lead role? Were there 8 other students who applied --- who 9 tried out for the lead role? 10 A. No. 11 Q. So it was just Jordan and 12 Jared? 13 A. Yeah. 14 Q. Okay. 15 And you know that it wasn't --- 16 she wasn't talking about Jared? 17 A. Yes. 18 Q. Okay. 19 How do you know that? 20 A. Because he got the lead role. 21 Q. Okay. 22 So if you turn to Exhibit 6, 23 tab number 6 and come in about ten 24 pages. And I apologize they're not 25 marked, but ---.</p>

9 (Pages 30 to 33)

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<p>1 A. That's okay. 2 Q. Okay. 3 That copy. 4 A. It says Wednesday? 5 Q. Nope. It says -- starts out 6 with I need your help. 7 Okay? 8 We'll have our Court Reporter 9 mark that as Plaintiff 3. 10 -- 11 (Whereupon, Plaintiff's 12 Exhibit 3, Defamatory 13 Email, was marked for 14 identification.) 15 -- 16 ATTORNEY READY: 17 I'm sorry, you said it's 18 behind tab six? 19 THE WITNESS: 20 Yep, it's --. 21 ATTORNEY READY: 22 Got it. 23 ATTORNEY O'DONNELL: 24 Are we ready? 25 Okay.</p>	<p>1 A. Sorry. This parent has made 2 -- 3 Q. Friends. 4 A. -- friends with Ms. Zackon on 5 the School Board. This -- 6 Q. Is helping. 7 A. -- is helping to be -- 8 Q. To fuel. 9 A. -- to fuel the fire? 10 Q. Yes. 11 A. Okay. 12 I can't read any of that. 13 Q. Okay. 14 I'm going to help you out. Dr. 15 Shank let me know today that this 16 parent is planning on attending the 17 School Board meeting tomorrow night at 18 7:00 p.m. in the high school library. 19 I am reaching out to ask any 20 and all parents that believe in this 21 program and students that love the 22 program to please show up to the Board 23 meeting to show your support. We are 24 in jeopardy of losing the program. 25 Any questions, feel free to</p>
Page 35	Page 37
<p>1 BY ATTORNEY O'DONNELL: 2 Q. You read until it fades out, 3 and then I will do my best to help 4 you. Read it out loud, please. 5 A. I need your help. I've spent 6 the last two months shielding the kids 7 from some very horrible stuff 8 happening behind the scenes with a 9 student and his mother. 10 Unfortunately, the situation 11 has escalated to the point that this 12 student posted something against 13 another student and police were called 14 in. This mother and her son want me 15 -- 16 Q. Fired. 17 A. -- fired, and in the mothers' 18 words, she's going to destroy me. All 19 because her son was not cast as Jack. 20 I have been working closely with Dr. 21 Shank and the -- 22 Q. Administrator. 23 A. -- administration since 24 January? 25 Q. Yes.</p>	<p>1 call me. And there's a phone number, 2 and its signed Stacy Lyons. Is this 3 the email that you are referring to? 4 A. Yes. 5 Q. Okay. 6 Do you know whether or not Mrs. 7 Eck said the words that she is going 8 to destroy Mrs. Lyons? 9 A. She never said that. 10 Q. In front of you? 11 A. She -- yeah. She never said 12 that in front of me. 13 Q. Okay. 14 Do you know whether or not Mrs. 15 Eck was upset that -- that Jordan was 16 not cast as Jack? 17 A. Yes, she was upset, but she was 18 still happy that he had received a 19 role and was going to be in Newsies. 20 Q. Okay. 21 And why was she upset that he 22 was not cast as Jack? 23 A. Well every parent gets upset 24 when their child doesn't get a role 25 that they wanted. Because he was very</p>

10 (Pages 34 to 37)

Page 38	Page 40
<p>1 excited for Newsies. It's one of his 2 favorite shows. And he was upset that 3 the did not receive the role, but he 4 -- so his mom was upset for him. 5 Q. For him? 6 A. Yes. 7 Q. Okay. 8 Do you know anything about a 9 posting by Jordan, him with some fruit 10 that Jared was allergic to? 11 A. Yes, but I posted it. 12 Q. Okay. 13 A. Jordan did not post it. 14 Q. Okay. 15 A. I had recorded and posted it. 16 Q. Okay. 17 So tell me about that. What 18 was -- you're -- you're smiling a 19 little bit, so I want to -- I want to 20 know what it's about. 21 A. Yeah. So the video -- right 22 after we had helped with the middle 23 school musical, we went back to his 24 house. And he was just being really 25 funny, and I was recording him. And</p>	<p>1 posting and took offense? 2 A. I did not know that until after 3 the fact. 4 Q. Okay. 5 And apparently, it didn't occur 6 to you that if you posted it, Jared 7 would see it. 8 Right? 9 A. No. 10 Q. Okay. 11 A. Well I had him on Snapchat 12 which -- 13 Q. Okay. 14 A. -- I posted it on, but I 15 didn't realize that he was going to 16 take offense to it -- 17 Q. Okay. 18 A. -- because it wasn't about 19 him. 20 Q. Okay. 21 And this -- would -- would 22 this have been after both Jared and 23 Jordan had received their roles from 24 Mrs. Lyons? 25 A. Yes.</p>
Page 39	Page 41
<p>1 he had an apple and he said, you are 2 the apple of my eye. And like, just 3 like little cute, like puns and flirty 4 jokes with, like fruit. I don't 5 remember all of them. I have the 6 video though. 7 Q. Okay. 8 Well you'll give that to your 9 attorney and he'll turn that over to 10 us. 11 Okay? 12 A. Yeah, he has it. 13 Q. Okay. Perfect. 14 So are you aware that Jared was 15 highly allergic to those fruits? 16 A. Yes I knew that, but it was not 17 intended for that reason. It's just 18 the fruits that Jordan had on his 19 counter. And he didn't use just 20 fruit. He also picked up like 21 marshmallow fluff and bread. So I 22 know Jared's not allergic to 23 marshmallow fluff or bread. 24 Q. Okay. 25 Do you know that Jared saw that</p>	<p>1 Q. Okay. 2 And are you aware that Jared 3 felt targeted because not a lot of 4 people -- not a lot of people agree 5 with her decision to cast Jared in the 6 lead role? 7 A. I'm sorry, could you repeat 8 that? 9 Q. Sure. 10 ATTORNEY O'DONNELL: 11 Could you repeat that? 12 BY ATTORNEY O'DONNELL: 13 Q. Jared felt targeted by other 14 students because he was cast in the 15 role that Jordan wanted, and Jordan 16 has now appeared in a post on 17 Instagram holding the fruit that Jared 18 is highly allergic to. 19 What would the likely 20 conclusion be of a person who already 21 feels targeted? Can you imagine? 22 A. Yes I can imagine how he would 23 feel, but it was a lot longer after 24 the fact that -- because once people 25 were like talking about how they</p>

11 (Pages 38 to 41)

Page 42	Page 44
<p>1 thought that Jared didn't deserve the</p> <p>2 part, it --- the video took place like</p> <p>3 about one to two months after the fact</p> <p>4 that we had all gotten --- we had a</p> <p>5 meeting saying that we should support</p> <p>6 our leads and not like tear them down.</p> <p>7 I had even posted --- I had even sent</p> <p>8 an email after I heard that everyone</p> <p>9 was talking bad about him.</p> <p>10 Q. About?</p> <p>11 A. About Jared.</p> <p>12 Q. Okay.</p> <p>13 A. After --- like, a little bit</p> <p>14 after we had come back to school and</p> <p>15 everyone, I heard that he was feeling</p> <p>16 very upset. I sent everyone an email</p> <p>17 saying that we should support the</p> <p>18 people who got these roles, and we</p> <p>19 should be happy and go on with the</p> <p>20 show and just support everyone and not</p> <p>21 tear anyone down. I do not know when</p> <p>22 I sent the email though. It wasn't</p> <p>23 --- it --- it was in January.</p> <p>24 Q. You --- you did say after we</p> <p>25 came back.</p>	<p>1 it. So he was afraid to I guess pass</p> <p>2 her? That's what I heard.</p> <p>3 Q. Okay.</p> <p>4 A. But Mrs. Eck is not violent at</p> <p>5 all.</p> <p>6 Q. You knew Mrs. Eck apparently</p> <p>7 better than Jared knew her. Is ---</p> <p>8 would you agree with that?</p> <p>9 A. Yes.</p> <p>10 Q. Okay.</p> <p>11 In this email that we just</p> <p>12 read, it --- it's not directed to ---</p> <p>13 well strike that. Do you know to whom</p> <p>14 this email is directed?</p> <p>15 A. Yes.</p> <p>16 Q. Who?</p> <p>17 A. Jordan Eck.</p> <p>18 Q. You --- you're answering the</p> <p>19 question do you know who --- who this</p> <p>20 email is about? I'm asking you, do</p> <p>21 you know who it was sent to?</p> <p>22 A. Yes. It was sent to the</p> <p>23 parents to the fellow cast, but not to</p> <p>24 all of them.</p> <p>25 Q. Okay.</p>
Page 43	Page 45
<p>1 A. Yes.</p> <p>2 Q. Would that be back from</p> <p>3 Christmas break?</p> <p>4 A. Yeah.</p> <p>5 Q. Are you aware that Jared</p> <p>6 continued to feel threatened and</p> <p>7 sought Mrs. Eck out in a parking lot</p> <p>8 in --- well, we'll strike that.</p> <p>9 Did Jared ever articulate to</p> <p>10 you that he felt threatened by the</p> <p>11 behaviors of Jordan and Mrs. Eck?</p> <p>12 A. No.</p> <p>13 Q. Okay.</p> <p>14 Did anyone else ever articulate</p> <p>15 to you that Jared felt threatened by</p> <p>16 Jordan and Mrs. Eck?</p> <p>17 A. Yes, Mrs. Eck.</p> <p>18 Q. Okay.</p> <p>19 Mrs. Eck knew that --- that</p> <p>20 Jared felt threatened by her?</p> <p>21 A. She had heard from someone, I</p> <p>22 do not know who, that he --- because</p> <p>23 they had --- so Mrs. Eck's youngest</p> <p>24 daughter had a dance class. And then</p> <p>25 Jared had a dance class right after</p>	<p>1 And as you read this email, do</p> <p>2 you believe that Mrs. Lyons is asking</p> <p>3 people to say something negative about</p> <p>4 Jordan Eck?</p> <p>5 A. Could you repeat that?</p> <p>6 Q. As you read this email, to your</p> <p>7 mind, can you tell me whether you read</p> <p>8 that to mean that Mrs. Lyons is saying</p> <p>9 is asking these parents to say</p> <p>10 something negative about Jordan Eck?</p> <p>11 A. No.</p> <p>12 Q. What is Mrs. Lyons asking the</p> <p>13 parents for?</p> <p>14 A. She's asking the parents to</p> <p>15 show their support for her at the</p> <p>16 Board meeting because of this negative</p> <p>17 --- in quotes, negative student.</p> <p>18 Q. Okay.</p> <p>19 And to you, what does showing</p> <p>20 support for the program mean?</p> <p>21 A. Talking about its</p> <p>22 accomplishments and saying how much it</p> <p>23 means to their children.</p> <p>24 Q. Does this email say anywhere</p> <p>25 that she's asking parents to show</p>

12 (Pages 42 to 45)

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<p>1 support for her specifically? And if 2 we need to reread that last paragraph, 3 I can help you. 4 ATTORNEY READY: 5 I'll represent --- you 6 can have a copy of it. Sorry. 7 Should've fished for this 8 sooner. 9 ATTORNEY O'DONNELL: 10 Okay. 11 Why don't you give it to 12 your ---? 13 ATTORNEY READY: 14 Sure. 15 BY ATTORNEY O'DONNELL: 16 Q. So that's the last paragraph. 17 And the question again is, does she 18 ask for support for her personally? 19 A. No. 20 Q. Okay. 21 A. But I know that she was asking 22 people --- well, her daughter was 23 asking people for --- to show support 24 for Mrs. Lyons herself. 25 Q. Okay.</p>	<p>1 in, but he was never talked to by 2 police nor was I. 3 Q. But do you know whether or not 4 the police were ever called about that 5 video? 6 A. I do not. 7 Q. Okay. 8 So is it true or untrue? 9 A. I do not know. 10 Q. Okay. 11 A. It is also defamation because 12 he was going to the School Board not 13 just --- not because he wasn't cast as 14 Jack. He was going to the School 15 Board to show his concerns about Mrs. 16 Lyons herself. He was actually happy 17 with his role as Race. Even though he 18 was upset he didn't get the lead, he 19 was still excited to go on with the 20 show. 21 Q. Was there any expression of 22 disappointment at the time when Mrs. 23 Lyons announced the cast members and 24 their parts? 25 A. Yes, he was upset.</p>
Page 47	Page 49
<p>1 But Mrs. Lyons didn't say that 2 in this email. 3 Right? 4 A. In this email, no. 5 Q. Okay. 6 So do you know what defamation 7 means? 8 A. Yes. 9 Q. Okay. 10 What does it mean? 11 A. Like --- like slandering 12 someone. 13 Q. What does slander mean? 14 A. Say something bad about them 15 that, like, isn't true. 16 Q. Is that it? 17 A. That's all I have. 18 Q. And what did --- what did Mrs. 19 Lyons say that was bad about Jordan? 20 A. That he posted a video and 21 police were called in when I posted 22 the video, and we did not hear 23 anything from the police. This made 24 him seem to be a very, like, violent 25 student because the police were called</p>	<p>1 Q. Okay. 2 A. But it was send out --- sent 3 out through an email. We don't find 4 out together. 5 Q. Okay. 6 So he gets an email that he has 7 the part as Race, and Jared gets an 8 email, sensibly, that he received the 9 part as Jack. And my question to you 10 is, once Jordan receives his email, 11 what was his response? 12 A. He was very upset. 13 Q. Okay. 14 Did he express that upset to 15 you? 16 A. I was not there at the time. 17 Q. Okay. 18 A. When we received the email. 19 Q. Okay. 20 Who --- do you know --- how do 21 you know he was upset? 22 A. Because he --- I had received 23 --- wait. Give me a sec. Well I knew 24 he was going to be upset because he 25 told me that he was going to be upset</p>

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Page 50	Page 52
<p>1 if he didn't get Jack. And then when 2 --- I was not there with him when he 3 got the email. 4 Q. Okay 5 Who was there with him when he 6 got the email? 7 A. His family. 8 Q. Okay. 9 Do you know --- did he tell you 10 what his reaction was when he received 11 the email? 12 A. His sister told me that he was 13 crying. 14 Q. Okay. 15 And how long did he cry? 16 A. I don't know. 17 Q. Okay. 18 And then what happened next? 19 He started to cry, and then ---? 20 A. I don't know. 21 Q. Okay. 22 What was the next thing you 23 heard from him or anyone in his family 24 about this part that he received from 25 the play?</p>	<p>1 Q. Okay. 2 A. I just know that he didn't not 3 like her. Like, in the beginning. I 4 --- 5 Q. In the beginning of January he 6 liked her? 7 A. No, I'm talking about like the 8 beginning of the school year. 9 Q. So in September he liked her? 10 A. Yes. 11 Q. By the time she cast him as 12 Race, he didn't like her? 13 A. I don't know. 14 Q. Okay. 15 So in any event, he gets cast 16 as Race and then he calls her to ask 17 what he could've done better in order 18 to get cast as Jack. 19 Is that correct? 20 A. Yeah. 21 Q. And what did he say? 22 A. I don't know. 23 Q. Okay. 24 And then what was the next 25 thing you heard?</p>
Page 51	Page 53
<p>1 A. I know that he called Mrs. 2 Lyons to ask what he could've done 3 better. 4 Q. Okay. 5 To --- to receive the part as 6 Jack? 7 A. Yeah. 8 Q. Okay. 9 A. He wanted like feedback on, as 10 to why, like what he could've 11 improved. 12 Q. Okay. 13 If he doesn't like Mrs. Lyons 14 to begin with, why is he asking her 15 for her opinion? 16 A. That's not true. 17 Q. Okay. 18 What's not true? 19 A. That he didn't like Mrs. Lyons. 20 Q. He liked Mrs. Lyons in some 21 parts, but didn't like her --- her 22 mannerisms? What --- what was it that 23 he liked about Mrs. Lyons, and what 24 was it that he didn't like about her? 25 A. I don't know.</p>	<p>1 A. I don't remember. 2 Q. Okay. 3 A. Sorry. 4 Q. That's no problem. So how long 5 did it take Jordan to accept the fact 6 that he was going to be Race and not 7 Jack, and be okay with it? 8 A. Probably like about five to 9 seven days. 10 Q. Okay. 11 And what about his mother? Did 12 you have any conversations with his 13 mother about how she felt that he was 14 not cast as Jack? 15 A. No. 16 Q. Okay. 17 Do you know whether you 18 overheard any conversations when you 19 were over at his house about him not 20 being cast as Jack? 21 A. Well I know she was upset about 22 it. I just don't know like how she 23 felt about anything else. 24 Q. Was she upset that he was 25 crying because he didn't get the role,</p>

14 (Pages 50 to 53)

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Page 54	Page 56
<p>1 or was he --- did she truly believe 2 that he should've been Jack? 3 A. I don't know. 4 Q. Okay. 5 Have you spoken with Vinny 6 about whether or not Jordan should've 7 been cast as Jack? 8 A. Yes. 9 Q. Okay. 10 And did Vinny have a feeling 11 one way or another about his casting? 12 About Jordan's casting? 13 A. Yes. 14 Q. Okay. 15 What did Vinny tell you? 16 A. Jordan --- Vinny wanted Jordan 17 to be Jack because of the character 18 relations in Newsies. 19 Q. Okay. 20 A. Because Vinny got cast as 21 Crutchie, which is Jack's best friend. 22 And Vinny and Jordan are, like best 23 friends. 24 Q. Okay. 25 A. So he was upset about that. I</p>	<p>1 A. I had decided to speak to the 2 School Board before this was sent out. 3 Q. Okay. Okay. 4 Let's go back to tab one, and 5 the complaint that we have marked as 6 Plaintiff 2. And I'd like you to take 7 a look at page 5, paragraph 25. And 8 it says, on the evening of March 20th, 9 2019 during the regularly scheduled 10 rehearsal for the school show, Mrs. 11 Lyons dismissed students to speak 12 positively on her behalf at the School 13 Board meeting. 14 Do you see that? 15 A. Uh-huh (yes). 16 Q. How do you know that? 17 A. I don't know that she dismissed 18 students to speak positively. I just 19 know that she dismissed students from 20 the rehearsal because a bunch of them 21 walked into the meeting together. 22 Q. And then in paragraph 26, it 23 says at this meeting three students, 24 Jordan, Haley, and Vinny, along with 25 several parents and alumni spoke</p>
Page 55	Page 57
<p>1 don't know the other reasons to why he 2 wanted Jordan to be Jack. I just know 3 that they were, like, felt that 4 connection through it. 5 Q. Okay. 6 Now do you know how Vinny got a 7 copy of this email that we've marked 8 as Plaintiff's 3? 9 A. I do not know. 10 Q. And you said Jordan showed this 11 to you? 12 A. Uh-huh (yes). 13 Q. Okay. 14 Yes? 15 A. Yes, sorry. 16 Q. And was --- was this email that 17 we're looking at, was this the, I'm 18 going to use the word infamous. Do 19 you know what that means? 20 A. No. 21 Q. Okay. 22 Was this the reason that you 23 made a statement to the School Board? 24 A. No. 25 Q. Okay.</p>	<p>1 against Mrs. Lyons while a majority of 2 students spoke in favor of her. 3 Do you see that? 4 A. Yes. 5 Q. Okay. 6 Do --- in addition to you, and 7 Jordan, and Vinny, who were the other 8 parents and alumni that spoke against 9 Mrs. Lyons? 10 A. It was Drew Eck, Tara Eck, 11 Vince Ferrizzi, Jessica Ferrizzi. I 12 don't know their names, but its --- 13 their last name's the Repko's. 14 Q. The Repko's? 15 A. Yeah. 16 Q. Are they parents? 17 A. Yes. 18 Q. Okay. 19 A. Their son --- their oldest son 20 was in the shows before, and their --- 21 their 2nd youngest son was in the 22 show, currently. 23 Q. What was his name? 24 A. His name is Sam Repko. 25 Q. Sam Repko. And how was he</p>

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Page 58	Page 60
<p>1 cast?</p> <p>2 A. He was cast as one of the</p> <p>3 Newsies. I don't remember the name.</p> <p>4 Q. Okay.</p> <p>5 A. Specs.</p> <p>6 Q. Specs?</p> <p>7 A. He had glasses.</p> <p>8 Q. Okay, okay.</p> <p>9 Now before the meeting, had you</p> <p>10 attended rehearsals?</p> <p>11 A. No.</p> <p>12 Q. Okay.</p> <p>13 What did you do before the</p> <p>14 meeting? What did you do that day and</p> <p>15 before the meeting?</p> <p>16 A. I was at Vinny's house with</p> <p>17 Jordan, Vinny, and their families.</p> <p>18 And we were planning our speeches for</p> <p>19 the meeting.</p> <p>20 Q. Okay.</p> <p>21 Did you go to school that day?</p> <p>22 A. I did, but then I left early.</p> <p>23 Q. Okay.</p> <p>24 Why did you leave early?</p> <p>25 A. Because of --- I don't remember</p>	<p>1 Q. Did he go to school?</p> <p>2 A. Yes.</p> <p>3 Q. You remember leaving school</p> <p>4 because Jordan was upset about</p> <p>5 something?</p> <p>6 A. Yes. I don't remember what it</p> <p>7 was though. I'm sorry.</p> <p>8 Q. Okay.</p> <p>9 Why did you have to leave</p> <p>10 school because he was upset?</p> <p>11 A. Because I wanted to be there</p> <p>12 for him.</p> <p>13 Q. Okay.</p> <p>14 So that means he had to have</p> <p>15 left school as well?</p> <p>16 A. Yes.</p> <p>17 Q. Okay.</p> <p>18 So you both left school early</p> <p>19 that day?</p> <p>20 A. Yes.</p> <p>21 Q. After 1st or 2nd period, or</p> <p>22 later?</p> <p>23 A. I don't remember.</p> <p>24 Q. Okay.</p> <p>25 How did you --- how did you get</p>
Page 59	Page 61
<p>1 specifically, but I remember that</p> <p>2 Jordan was very upset and he wanted to</p> <p>3 talk to someone about it, but no one</p> <p>4 was there to, like, talk to him. We</p> <p>5 --- she --- he had tried to talk to</p> <p>6 Mr. Becker, Dawn Cambria the student</p> <p>7 services person, and others, but there</p> <p>8 was no one there that could talk to</p> <p>9 him.</p> <p>10 Q. That was Jordan?</p> <p>11 A. Uh-huh (Yes).</p> <p>12 Q. Wasn't Vinny running around</p> <p>13 trying to find someone to find --- to</p> <p>14 talk to as well about the email?</p> <p>15 A. I do not know.</p> <p>16 Q. Okay.</p> <p>17 But Jordan was as well?</p> <p>18 A. I don't know if he was --- I</p> <p>19 don't remember if it was about the</p> <p>20 email.</p> <p>21 Q. What was Jordan upset about?</p> <p>22 A. I don't remember.</p> <p>23 Q. But Jordan was upset that</p> <p>24 morning?</p> <p>25 A. Yes.</p>	<p>1 out of going to school? Did you call</p> <p>2 your mother or something?</p> <p>3 A. Uh-huh (yes).</p> <p>4 Q. Okay.</p> <p>5 You simply called your mother?</p> <p>6 Yes? Is that a yes?</p> <p>7 A. Yes. Yes.</p> <p>8 Q. Okay.</p> <p>9 And said, I need to leave</p> <p>10 school why? Because Jordan is upset?</p> <p>11 A. It was about, like, the reason</p> <p>12 but I don't remember the reason.</p> <p>13 Q. Okay. Okay. Okay.</p> <p>14 Were you upset at all, or you</p> <p>15 just needed to be there for Jordan?</p> <p>16 A. I don't believe I was upset. I</p> <p>17 think I was more frustrated at the</p> <p>18 fact that, like, he wanted help and no</p> <p>19 one was there to help him.</p> <p>20 Q. So what kind of help --- you</p> <p>21 don't remember though? You don't know</p> <p>22 what his problem was?</p> <p>23 A. No I don't.</p> <p>24 Q. Okay.</p> <p>25 A. It was either --- I think it</p>

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Page 62	Page 64
<p>1 was about the video. 2 Q. Okay. 3 A. But I don't remember. 4 Q. Okay. 5 And what would it have been 6 about the video that he would've been 7 upset about? 8 A. That he was accused of bullying 9 Jared. 10 Q. Okay. Okay. 11 So how -- what was the 12 conversation then with you, Vinny, 13 Jordan, and their parents about 14 putting together this statement 15 against Mrs. Lyons? 16 A. They wanted us to write down 17 everything so we had it planned out so 18 we weren't, like, just put on the 19 spot. 20 Q. Do you remember what you wrote? 21 A. Kind of. 22 Q. Okay. 23 Tell me what you remember. 24 A. I had started writing about how 25 Jared had thrown a binder at me, and</p>	<p>1 half of them couldn't do cartwheels. 2 Q. Okay. 3 A. Which is dangerous because 4 someone could've got kicked in the 5 face. 6 Q. Right. 7 A. She left Jordan with -- while 8 -- when he was 17, with a bunch of 9 students and left. And left him in 10 charge when he wasn't an adult. 11 Q. Okay. 12 A. So she left a bunch students 13 unattended, which is not good. 14 Q. Okay. 15 Anything else that you can 16 think of that's where she was 17 unprofessional? 18 A. She would call students out. 19 Q. We know that she called Vinny 20 out. 21 Right? And -- yes? 22 A. Yes. 23 Q. Anyone else that you know that 24 she called out? 25 A. Not during Newsies, but during</p>
Page 63	Page 65
<p>1 when I told Mrs. Lyons, she dismissed 2 it. Then I was talking about how she 3 was very unprofessional and I was 4 writing about how she was accusing 5 Jordan of abusing me. And --- but 6 she's very disrespectful to the 7 students, and to the -- the -- her 8 being unprofessional, like, in 9 general. 10 Q. Okay. 11 And when you say 12 unprofessional, what do you mean by 13 that? 14 A. She did not start rehearsals on 15 time. 16 Q. Okay. 17 A. She came to rehearsals late. 18 We would end rehearsals after the 19 times so parents would be sitting 20 outside, waiting for their students 21 -- their children. 22 Q. Okay. 23 A. Not students. Once, she tried 24 to have 30 people do a cartwheel, 25 like, right next to each other when</p>	<p>1 previous shows, she had called out 2 Michael Repko and Ralphie Forsyth -- 3 Q. Okay. 4 A. -- for something. And she 5 would call out the seniors by saying 6 that we were a bad influence to the 7 under classman, and she would say -- 8 she once said that the middle 9 schoolers that were putting on a show 10 were more -- she said they were, 11 like, angels, which wasn't true at 12 all. 13 Q. Okay. 14 A. And made like, all of the 15 students feel bad in, like, the 16 Newsies class because they were like 17 oh, middle schoolers are better than 18 us. Just putting a damper on people's 19 mental states. 20 Q. Okay. 21 A. Yeah, and she would say that we 22 weren't trying hard enough, and that 23 we had to put more effort into -- 24 into practicing when everyone was 25 trying as hard as they could.</p>

17 (Pages 62 to 65)

Page 66	Page 68
<p>1 Q. Okay.</p> <p>2 And so on paragraph 27, if</p> <p>3 you'll come down with me. It says,</p> <p>4 the School Board announced at the</p> <p>5 outset that it would not allow any</p> <p>6 character association --- pardon me,</p> <p>7 assassination of Mrs. Lyons and that</p> <p>8 only positive comments about her and</p> <p>9 her comment would be tolerated.</p> <p>10 Now, who do you mean by the</p> <p>11 School Board? The, like all the</p> <p>12 people up there?</p> <p>13 A. Yes.</p> <p>14 Q. They all said that?</p> <p>15 A. Not all of them. It was Mr.</p> <p>16 Pollock.</p> <p>17 Q. And who is Mr. Pollock?</p> <p>18 A. He's the School Board</p> <p>19 President.</p> <p>20 Q. Okay.</p> <p>21 Are you absolutely sure about</p> <p>22 that?</p> <p>23 A. No.</p> <p>24 Q. Okay.</p> <p>25 A. But it was either him or Mister</p>	<p>1 can't assassinate anyone's character</p> <p>2 in your speeches? Did it happen</p> <p>3 before you started speaking, or while</p> <p>4 you were speaking?</p> <p>5 A. Both.</p> <p>6 Q. Okay.</p> <p>7 So you --- so he said, before</p> <p>8 you even --- before anyone said</p> <p>9 anything, he said no character</p> <p>10 assassination.</p> <p>11 Right?</p> <p>12 A. Yes.</p> <p>13 Q. Okay.</p> <p>14 And then who spoke first?</p> <p>15 A. It was Drew Eck.</p> <p>16 Q. Okay.</p> <p>17 And what did Mr. Eck say?</p> <p>18 A. I don't remember specifically,</p> <p>19 but he had start --- started to talk</p> <p>20 about Mrs. Lyons, and then they ---</p> <p>21 they cut him and they said you're not</p> <p>22 allowed to use names or character</p> <p>23 assassinate.</p> <p>24 Q. Okay.</p> <p>25 And then did he finish his</p>
Page 67	Page 69
<p>1 --- Mr. Burns or Kubitz. One of them.</p> <p>2 Q. So it was either Mr. Pollock,</p> <p>3 or Mr. Burns, or Mr. Kubitz?</p> <p>4 A. Yes. It was one of them. I</p> <p>5 just don't remember which one.</p> <p>6 Q. And you're absolutely sure it</p> <p>7 was one of them?</p> <p>8 A. Yes.</p> <p>9 Q. Okay.</p> <p>10 No doubt in your mind?</p> <p>11 A. No doubt.</p> <p>12 Q. Okay.</p> <p>13 Was it all three?</p> <p>14 A. No, it was just one person.</p> <p>15 Q. And what about the Board</p> <p>16 Solicitor? Do you know what that</p> <p>17 means?</p> <p>18 A. No.</p> <p>19 Q. Was there an attorney up there?</p> <p>20 A. I have no clue.</p> <p>21 Q. Okay.</p> <p>22 And who was speaking, or did</p> <p>23 anyone speak at the time that either</p> <p>24 Mr. Pollock, or Mr. Burns, or Mr.</p> <p>25 Kubitz --- Kubitz announced that you</p>	<p>1 statement without naming names or</p> <p>2 assassinating her character?</p> <p>3 A. He tried to.</p> <p>4 Q. Okay.</p> <p>5 And then who was next to speak?</p> <p>6 A. I don't remember.</p> <p>7 Q. And then who also spoke?</p> <p>8 A. I --- I know that a bunch of</p> <p>9 parents spoke. Most of them were</p> <p>10 saying how children who are, like,</p> <p>11 feel that their entitled don't ---</p> <p>12 shouldn't be like --- they were saying</p> <p>13 the program was really great, and that</p> <p>14 entitled --- students are entitled and</p> <p>15 they --- they're spoiled. They ---</p> <p>16 people who get the part deserve the</p> <p>17 part, and you shouldn't be upset just</p> <p>18 because you didn't get the part you</p> <p>19 want when --- and I know it was --- it</p> <p>20 was --- not a lot of people spoke</p> <p>21 against Mrs. Lyons.</p> <p>22 Q. Okay.</p> <p>23 So speaking against --- so</p> <p>24 besides you, and Jordan, and Vinny,</p> <p>25 anybody --- and Mr. Eck, anybody else</p>

18 (Pages 66 to 69)

Page 70	Page 72
<p>1 that spoke against Mrs. Lyons?</p> <p>2 A. Yes. There was Vince Ferrizzi.</p> <p>3 Haley Richard had, who is a student,</p> <p>4 wrote a letter because she was too</p> <p>5 afraid to show up.</p> <p>6 Q. Okay.</p> <p>7 A. Because she was afraid that she</p> <p>8 was going to get, like --- what's it</p> <p>9 called? She was afraid to get, like,</p> <p>10 punished by --- from --- for speaking</p> <p>11 out.</p> <p>12 Q. Okay.</p> <p>13 So did someone read her letter?</p> <p>14 A. Yes.</p> <p>15 Q. Who?</p> <p>16 A. Tara Eck.</p> <p>17 Q. Tara Eck wrote her --- wrote</p> <p>18 --- read ---</p> <p>19 A. Read her letter.</p> <p>20 Q. --- the Board her letter?</p> <p>21 A. Yep.</p> <p>22 Q. Were you stopped while you were</p> <p>23 speaking?</p> <p>24 A. Yes.</p> <p>25 Q. Okay.</p>	<p>1 students interrupted me.</p> <p>2 Q. What students interrupted you?</p> <p>3 A. It was Rachael Shaner, but I</p> <p>4 don't remember what she said</p> <p>5 specifically. But she interrupted me,</p> <p>6 and she said something along the lines</p> <p>7 of well, you're here. We're here to</p> <p>8 protect her, something like that.</p> <p>9 Q. So in paragraph 29, you state</p> <p>10 accordingly Jordan, Haley, and Vinny,</p> <p>11 along with all others who spoke</p> <p>12 against Mrs. Lyons were severely</p> <p>13 curtailed in their ability to speak</p> <p>14 their few points about the situation</p> <p>15 that had developed in regards to the</p> <p>16 school show.</p> <p>17 Do you see that?</p> <p>18 A. Yes.</p> <p>19 Q. Okay.</p> <p>20 Now was there some way you</p> <p>21 could have presented your view point</p> <p>22 to the Board without specifically</p> <p>23 naming Mrs. Lyons or specifically</p> <p>24 expressing your dislike for her</p> <p>25 professionalism?</p>
Page 71	Page 73
<p>1 And at what part of your ---</p> <p>2 first of all, what did you say and</p> <p>3 then when were you stopped?</p> <p>4 A. I began to speak about the</p> <p>5 binder situation with Jared. And</p> <p>6 then, when I said that --- when I told</p> <p>7 them that he started yelling at me,</p> <p>8 and I was repeating what he said, they</p> <p>9 said you're not allowed to character</p> <p>10 assassinate.</p> <p>11 Q. Jared?</p> <p>12 A. Yes.</p> <p>13 Q. Okay.</p> <p>14 You were --- so --- okay. And</p> <p>15 then, what about Misses --- so you ---</p> <p>16 you were --- you were speaking about</p> <p>17 Jared, and were --- did you ---?</p> <p>18 A. And then I was going to get</p> <p>19 into the fact that when I told Mrs.</p> <p>20 Lyons, she completely dismissed me.</p> <p>21 And then, I was --- I had spoken about</p> <p>22 how she was very unprofessional, and I</p> <p>23 brought up how she had let a bunch of</p> <p>24 students out of the rehearsal to come</p> <p>25 to the meeting. And then, the</p>	<p>1 A. Not really.</p> <p>2 Q. You didn't know how to do that?</p> <p>3 A. I had --- when they kept</p> <p>4 stopping me, I had tried to like</p> <p>5 switch my view point to like try to</p> <p>6 say stuff about her without saying her</p> <p>7 name.</p> <p>8 Q. Right.</p> <p>9 A. But it was difficult. I had</p> <p>10 --- I had brought up that the drama</p> <p>11 club was a place for everyone to feel</p> <p>12 like family and not it felt unsafe.</p> <p>13 Q. What was --- what was unsafe</p> <p>14 about drama club?</p> <p>15 A. It was biased. There was ---</p> <p>16 there were little cliques starting to</p> <p>17 form. And then, if you wanted to talk</p> <p>18 to that little clique, they wouldn't</p> <p>19 talk to you. People --- it was</p> <p>20 dangerous because like the cartwheels</p> <p>21 thing.</p> <p>22 Q. Okay.</p> <p>23 Unsafe and dangerous because</p> <p>24 people wouldn't talk to you and</p> <p>25 cartwheels were being ---?</p>

19 (Pages 70 to 73)

Page 74	Page 76
<p>1 A. Well yeah. It --- there was, 2 like, dangerous activities go --- like 3 that we were doing. Like, we were 4 jumping over people. It just felt 5 like a very, like, non-friendly 6 environment. 7 Q. So you --- is it true that you 8 were severely curtailed from speaking 9 negatively about Mrs. Lyons, but you 10 were able to talk about what you 11 didn't like the program itself? 12 A. Yes and no. 13 Q. Okay. 14 Tell me the yes and no. 15 A. I enjoyed the program. It's 16 just who was running the program. 17 Q. Well right. I understand how 18 you feel, but the Board only wanted to 19 hear what you didn't like about the 20 program and not about the person. 21 Right? 22 A. Right. 23 Q. Okay 24 And you were able to talk about 25 what you didn't like about the</p>	<p>1 then after the School Board meeting? 2 A. Yes, but it was after the 3 lockdown. 4 Q. Okay. 5 Now do you know what lockdown 6 means? 7 A. Yeah. When all of the doors 8 are locked, and you have to stay in 9 one room. 10 Q. Okay. 11 And is that usually --- did you 12 hear --- where did you learn that 13 word? 14 A. In school. 15 Q. Okay. 16 And was --- is --- usually that 17 for preparation in the event of an 18 active shooter? 19 A. Yes. 20 Q. Okay. 21 A. Or like if someone dangerous 22 comes on to the school property, yeah. 23 Q. Okay. 24 So lockdown would mean the 25 whole building.</p>
Page 75	Page 77
<p>1 program, but you couldn't say anything 2 --- 3 A. About --- 4 Q. --- of color if --- as it were 5 about Mrs. Lyons specifically? 6 A. Yes. 7 Q. Okay. 8 And the idea was, was it not, 9 not to embarrass Mrs. Lyons in --- in 10 a public School Board meeting? It was 11 okay to take a shot at the program, 12 but not at the person writing it? 13 Would you agree with me? 14 A. Yes. 15 Q. Okay. 16 Now in paragraph two, 32, it 17 says at this time, the students were 18 placed on lockdown for their safety 19 and the doors to the auditorium were 20 locked. No students were permitted to 21 enter or leave after this time. 22 Do you see that? 23 A. Uh-huh (yes). 24 Q. Okay. 25 So did you go back to rehearsal</p>	<p>1 Right? 2 A. Yes. 3 Q. Okay. 4 So was the whole building 5 locked down? 6 A. It was just the auditorium. 7 Q. Okay. 8 And were all the doors locked? 9 A. I do not know specifically. 10 Q. Okay. 11 How did you get in? 12 A. Well when I had got there, the 13 doors were open and unlocked. 14 Q. Okay. 15 So you never had to deal with 16 this locked door situation at all. 17 Right? 18 A. No. 19 Q. Okay. 20 A. I did not. 21 Q. Okay. 22 In paragraph 33 on page 6, it 23 reads Mrs. Lyons went around the room 24 asking students to share what they had 25 said and also to share what Haley,</p>

20 (Pages 74 to 77)

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<p>1 Jordan, and Vinny had said against 2 her. 3 Were you there when that 4 happened? 5 A. I was not. 6 Q. Okay. 7 So you don't know that to be 8 true. 9 Correct? 10 A. It was told to me by other 11 students. 12 Q. Okay. 13 But you don't know that 14 personally. 15 Right? 16 A. Yes. I do not know. 17 Q. Because other students aren't 18 Plaintiffs in this lawsuit. Only you 19 are. 20 Right? 21 A. Uh-huh (yes). 22 Q. Okay. 23 Is that a yes? 24 A. Yes, sorry. 25 Q. It states, she asked direct and</p>	<p>1 talking to them. 2 Q. He took a while to finish 3 talking to people --- 4 A. Yeah. 5 Q. --- after the School Board 6 meeting? 7 A. Yeah, yeah, yeah. 8 Q. And paragraph 36 said after 9 rehearsal concluded, Jordan addressed 10 to the others students at that time 11 and said he hoped everyone could move 12 on together and have a great show. 13 Do you see that? 14 A. Yes. 15 Q. And were you there for that? 16 A. Yes. 17 Q. Okay. 18 What did he mean that he hoped 19 everyone could move on? 20 A. Because when people had heard 21 we were going to talk out at the 22 School Board meeting, they had like 23 turned against us into like --- and 24 viewed us in a negative way. 25 Q. And what did Jordan say to make</p>
Page 79	Page 81
<p>1 pointed questions about the statements 2 of students who opposed her at the 3 School Board meeting. What did people 4 tell you about the direct and pointed 5 questions? 6 A. They did not tell me about the 7 direct and pointed questions. 8 Q. Okay. 9 In paragraph 35, it says Jordan 10 and Haley were allowed back in when 11 the doors were unlocked. Did anyone 12 open the doors for you? 13 A. No. 14 Q. They were already unlocked by 15 the time you got there? 16 A. Uh-huh (yes). 17 Q. Yes? 18 A. Yeah. Because I had been 19 waiting for Jordan after the meeting 20 had finished and he took a while to 21 talk to people. 22 Q. Okay. 23 And why did he take a while to 24 talk to people? 25 A. I don't know. He was just</p>	<p>1 them feel differently? 2 A. That he hoped that we could all 3 move on together, and have a great 4 show and enjoy it. 5 Q. Did he apologize for trying to 6 bring to the Board's attention those 7 things about the program and Mrs. 8 Lyons that he didn't like? 9 A. No. 10 Q. Were people receptive to his 11 idea that they should all move on 12 together? 13 A. I do not know. 14 Q. Did anyone say anything in 15 response to Jordan? 16 A. No. 17 Q. Were you there at the time when 18 Jordan asked to speak to Mrs. Lyons 19 privately? 20 A. Yes. 21 Q. Okay. 22 You were --- were you there 23 when he actually did speak to her? 24 A. No. 25 Q. Okay.</p>

21 (Pages 78 to 81)

Page 82	Page 84
<p>1 And what did he say to her, and 2 how did it happen? In other words, 3 how did he ask her to speak to her 4 privately? Where were you? 5 A. We were in the auditorium. 6 Q. Okay. 7 A. Yeah, and he had just gone up 8 to her and asked if he could talk to 9 her privately. 10 Q. Where --- where were you in 11 rehearsal? Where were you in the ---? 12 A. It was right after rehearsal 13 ended that he asked to talk to her 14 privately. 15 Q. Okay. 16 So did she then --- is there a 17 formal ending to rehearsal? She slaps 18 --- claps her hands and says okay, 19 we're finished or how does that work? 20 A. There's not usually a formal 21 ending. 22 Q. Okay. 23 A. It's just usually like we will 24 run through something and then, like 25 after we ran through that, if the time</p>	<p>1 the auditorium to speak. 2 Q. Okay. 3 And you weren't there to hear 4 any of it? 5 A. No, but Maria Jones was and 6 Abby Hartenstine. 7 Q. Okay. 8 Did you go home with Jordan 9 that evening? 10 A. Yes because my car was at his 11 house. 12 Q. Okay. 13 And then, did you stay there 14 the night? 15 A. No I left. 16 Q. Okay. Okay. 17 And then, did you go to school 18 the next morning? 19 A. Yes. 20 Q. Okay. 21 And did anything happen the 22 next day? 23 A. Yes. 24 Q. What happened? 25 A. We had gotten called down for a</p>
Page 83	Page 85
<p>1 was --- if like we were done with what 2 she wanted to do for the day, we were 3 done. 4 Q. How --- when did she tell you 5 that you're finished? 6 A. She would say okay, you can go 7 home. 8 Q. Okay. Okay. 9 You can go home. So people are 10 starting to leave, and you and Jordan 11 went up to Mrs. Lyons? 12 A. I did not go up with him. 13 Q. How do you know that he went up 14 to her? 15 A. Because I saw him. 16 Q. Okay. 17 Do you know what was said? 18 A. I do not. 19 Q. Okay. 20 You just know because of --- 21 how --- how do you know that he asked 22 to speak to her privately? 23 A. Because after he had gone up to 24 her, they had gone out into the 25 auditorium --- in the hallway next to</p>	<p>1 cast meeting. At this time, Jordan 2 had told me that he had been removed 3 from the show and suspended over text. 4 Q. He --- he --- he texted you and 5 said I've been removed from the show? 6 A. Yes. 7 Q. Yes? Okay. 8 Did he say why? 9 A. No. 10 Q. Okay. 11 So what class period --- you 12 --- well strike that. Where were you 13 when you received this text? 14 A. I was in the guidance office 15 doing homework. 16 Q. Why were you in the guidance 17 office doing your homework? 18 A. I don't remember. 19 Q. Okay. 20 So you were in the guidance --- 21 were you --- was it in school 22 suspension or was it something else? 23 A. No. No. I just had --- I like 24 the guidance counselors there and the 25 environment's very quiet. So it's a</p>

22 (Pages 82 to 85)

Page 86	Page 88
<p>1 good place to do work. 2 Q. Okay. 3 So you were in the guidance 4 office doing some homework and you got 5 a text from Jordan. And he said, he 6 was removed from the play? 7 A. Yes. 8 Q. Anything else? 9 A. And then we got called down for 10 the cast meeting. 11 Q. We got called down. So how 12 were you notified that there was a 13 cast meeting? 14 A. They said members of Newsies, 15 please report to the auditorium. 16 Q. Okay. 17 So that was over the 18 loudspeaker? 19 A. Yes. 20 Q. Okay. 21 And then you went down to the 22 auditorium? 23 A. Yes. 24 Q. What happened next? 25 A. We had all sat down and Dr.</p>	<p>1 So I started packing my things. 2 And then, she said --- probably said 3 something along the lines of if any of 4 the drama happens the show's going to 5 be cancelled. I don't remember like 6 the exact order of everything. 7 Q. Okay. 8 A. But I know that's what she 9 said. And while I was packing my 10 things, she looked at me again and she 11 said, and you look like you're ready 12 to leave so you can go. 13 So at that time, I --- I got 14 offended. I was like, okay. Then I 15 will leave. And I took --- I stood up 16 and I said fine. I quit. And then I 17 walked out. 18 Q. So who --- did you say fine I 19 quit because you were frustrated, or 20 did you not want to be in Newsies any 21 longer? 22 A. I said that because it felt 23 like I wasn't allowed to be there 24 anymore. 25 Q. So Dr. Shank did not use your</p>
Page 87	Page 89
<p>1 Shank and Mr. Becker were there. And 2 then, Dr. Shank had begun to state how 3 all of the drama in the drama club had 4 to end and that there was no more --- 5 you were not allowed to question the 6 authority of Mrs. Lyons or the 7 production team, and that if there was 8 any more drama to happen, she was just 9 going to just cancel the whole --- 10 whole show. 11 And then, she had --- she then 12 looked at me directly and said, and if 13 anyone wants to quit, you can quit. 14 The door is right there. But if you 15 leave, you're not allowed to come 16 back. 17 At this time, I got frustrated, 18 so I started packing my things away 19 because it felt like she called me 20 out. Everyone had saw that she looked 21 right in my eye --- like, looked 22 directly at me and said this. So I 23 was very upset and I was frustrated 24 because it --- I felt very offended 25 that she just called me out like that.</p>	<p>1 name directly. 2 Correct? 3 A. No she did not, but she started 4 directly at me. 5 Q. Okay. 6 So she picked you out of the 7 crowd, and looked at you. 8 Right? 9 A. Yes. 10 Q. If you had done nothing wrong, 11 and you didn't feel a certain way, and 12 you weren't creating drama, why would 13 you take that personally? 14 A. Because I had spoken at the 15 School Board meeting against Mrs. 16 Lyons. 17 Q. Okay. 18 So did you feel ---? 19 A. So that was part of the drama 20 club drama. 21 Q. Okay. 22 Do you think Dr. Shank meant to 23 eject you from the drama club and the 24 room, or do you think she meant to 25 firmly get across her point that she</p>

23 (Pages 86 to 89)

Page 90	Page 92
<p>1 wanted the drama to stop?</p> <p>2 A. I felt that she was trying to</p> <p>3 personally, like, attack me with that</p> <p>4 statement. Out of all the people that</p> <p>5 had not gone to the School Board</p> <p>6 meeting that she could have looked at,</p> <p>7 she could have. She could have said,</p> <p>8 and if any of you want to quit, you</p> <p>9 can. The door's right there. But she</p> <p>10 directly looked right at me.</p> <p>11 Q. Did you want to quit?</p> <p>12 A. I did not want to quit. I ---</p> <p>13 I love performing. And I really</p> <p>14 wanted to be in the show Newsies, and</p> <p>15 I wanted to move forward with Jordan.</p> <p>16 And when I heard that he was</p> <p>17 suspended, I was --- when I heard that</p> <p>18 he was removed, I was very upset and I</p> <p>19 was frustrated. And I was just --- I</p> <p>20 was thinking, maybe I shouldn't do the</p> <p>21 show, but ---.</p> <p>22 Q. Were --- would you have stayed</p> <p>23 and performed without Jordan being in</p> <p>24 the play?</p> <p>25 A. Possibly. I was thinking about</p>	<p>1 her, in front of everyone as you were</p> <p>2 packing, that you were about to leave.</p> <p>3 Right?</p> <p>4 A. Well, I thought the meeting was</p> <p>5 coming to a close.</p> <p>6 Q. Well okay, but by packing up</p> <p>7 when no one else was packing, you were</p> <p>8 demonstrating, by your actions, that</p> <p>9 you were getting ready to leave.</p> <p>10 Right?</p> <p>11 A. Yes.</p> <p>12 Q. Okay.</p> <p>13 A. Because I felt the meeting was</p> <p>14 coming to a close.</p> <p>15 Q. Okay.</p> <p>16 But it hadn't come to a close</p> <p>17 yet.</p> <p>18 Right?</p> <p>19 A. Yes.</p> <p>20 Q. And no one else was packing.</p> <p>21 Right?</p> <p>22 A. I don't think so.</p> <p>23 Q. Okay.</p> <p>24 So she's got a direct view of</p> <p>25 you, and you take the actions of</p>
Page 91	Page 93
<p>1 before all of the other people there.</p> <p>2 Q. So you had to make a decision</p> <p>3 about whether or not you wanted it?</p> <p>4 In other words, more important to stay</p> <p>5 in the play without Jordan or quit and</p> <p>6 support him?</p> <p>7 A. No. I felt that it was more</p> <p>8 for myself. If I was going to quit</p> <p>9 --- well, I quit because I felt that</p> <p>10 she was pretty much telling me to</p> <p>11 leave.</p> <p>12 Q. She said if you don't like it,</p> <p>13 then leave?</p> <p>14 A. Yes. And she was looking</p> <p>15 directly at me.</p> <p>16 Q. But what if you just sat back</p> <p>17 down and were just like really quit</p> <p>18 and looked down?</p> <p>19 A. But I didn't stand up at the</p> <p>20 time.</p> <p>21 Q. But you were packing.</p> <p>22 A. Yes. I was packing my stuff</p> <p>23 because I was frustrated with this</p> <p>24 whole ---.</p> <p>25 Q. So your actions were telling</p>	<p>1 starting to pack your things. You are</p> <p>2 not speaking directly to her, but you</p> <p>3 are telling her through her actions,</p> <p>4 through your actions, that you're</p> <p>5 getting ready to leave.</p> <p>6 Right?</p> <p>7 A. Yes.</p> <p>8 Q. Okay.</p> <p>9 So she looks at you, and she</p> <p>10 call --- basically calls you out. And</p> <p>11 she says, Haley, you want to go,</p> <p>12 there's the door. And you had a</p> <p>13 choice then, didn't you? You could've</p> <p>14 stopped unpacking and said no, I want</p> <p>15 to stay or you could've left.</p> <p>16 A. But I felt personally attacked</p> <p>17 so I wanted to leave. I didn't want</p> <p>18 to stay in an environment where I felt</p> <p>19 I wasn't welcome. She had said, and</p> <p>20 you look like you're ready to go so</p> <p>21 you can leave. She wasn't giving me</p> <p>22 an option.</p> <p>23 Q. Okay. Okay.</p> <p>24 And then you said, fine. Fine,</p> <p>25 I'll quit?</p>

24 (Pages 90 to 93)

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<p>1 A. I quit. And then I walked out. 2 Q. So if you didn't say fine I'll 3 quit and just left, you could still be 4 in the play, couldn't you? 5 A. I felt that if I had --- I 6 don't --- I don't think so. 7 Q. Hear me out. You could have 8 still been in the play. The question 9 is whether you would want to. But 10 backing up, if you didn't say I quit, 11 you could've still been in the play. 12 Right? 13 A. She told me to leave. 14 Q. Well she told you to leave the 15 room, but it --- the meeting was 16 almost over anyway. 17 Right? 18 A. I don't know --- 19 Q. Well --- 20 A. --- because I left early. 21 Q. Well right. You said --- 22 A. I said I assumed that it was 23 coming to a close --- 24 Q. Okay. 25 A. --- because we had been there</p>	<p>1 really play a big part in that. 2 Before, when we weren't dating, I had 3 done the shows. I loved performing. 4 That's why. 5 Q. So that was a situation where 6 you needed to sit down and be quiet to 7 stay in, or just ask her no, I'd like 8 to stay. May I stay? And did --- I 9 mean, you could have. 10 Right? But you were 11 intimidated? 12 A. Yeah, I was intimidated. 13 Q. All right. Fine. 14 Then what happened? 15 A. Then I had left. And then, I 16 had gone to the guidance counselor and 17 she had said that it would be best 18 that if I should, like, leave because 19 I was very emotional. She asked Mr. 20 Becker if I could leave. Then I ended 21 up in his office. 22 Q. Okay. 23 Tell me about your conversation 24 with Mr. Becker because it seems like, 25 just from some of the documents that</p>
Page 95	Page 97
<p>1 for a while. 2 Q. Fine. So you assumed the 3 meeting was coming to a close. She 4 told you to leave. You left, but the 5 meeting was coming, in your mind, to a 6 close anyway. It wasn't like you were 7 going to miss much. 8 A. Yeah. 9 Q. Right? Now you could've stayed 10 in the play. If you didn't say I 11 quit, there is a likelihood that you 12 still could've been in the play. 13 Right? 14 A. Possibly. 15 Q. Okay. 16 But then there was this next 17 question about whether you actually 18 wanted to be in the play. A, because 19 you didn't like the environment right 20 then and there. And Jordan wasn't in 21 the play any longer. So then you had 22 to decide, do I really even want to be 23 here under these circumstances. 24 Right? 25 A. Well yes, but Jordan didn't</p>	<p>1 your attorney turned over, you did not 2 understand that you were being 3 suspended. 4 A. He did not tell me I was being 5 suspended. 6 Q. He didn't use the word 7 suspended. 8 Right? 9 A. No he didn't. At all. 10 Q. Okay, all right. So --- 11 A. He said that I was going to 12 give an excused absence. He said --- 13 he had said that you're very upset, 14 and you're not going to be able to 15 learn anything if --- while you're 16 upset, being in school. You're going 17 to be more focused on that. 18 So you can leave today and you 19 can take tomorrow off. And then come 20 back on Monday for a fresh start. At 21 which, he did not say at all that I 22 was going to be suspended. If I was 23 told that I was going to be suspended 24 for that absence, then I would've 25 shown up to school.</p>

25 (Pages 94 to 97)

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<p>1 Q. Why?</p> <p>2 A. Because I have to.</p> <p>3 Q. For --- if you were told that</p> <p>4 you were being suspended, you weren't</p> <p>5 allowed to come into the building.</p> <p>6 Right?</p> <p>7 A. But he told me that I was going</p> <p>8 to be given an excused absence.</p> <p>9 Q. All right.</p> <p>10 But ---.</p> <p>11 A. I mean, if I was told I was</p> <p>12 going to be suspended, obviously I</p> <p>13 wouldn't go to the school. But like,</p> <p>14 he didn't say anything about</p> <p>15 suspension.</p> <p>16 Q. Right. Okay.</p> <p>17 So when he said to leave today,</p> <p>18 you left.</p> <p>19 Right?</p> <p>20 A. Yes.</p> <p>21 Q. And he told you to take</p> <p>22 tomorrow off.</p> <p>23 Right?</p> <p>24 A. Yes.</p> <p>25 Q. And you didn't come to school?</p>	<p>1 A. Not at the time, but I'm going</p> <p>2 to be.</p> <p>3 Q. Well how --- okay. And ---.</p> <p>4 A. Usually scholarships ask if</p> <p>5 you've been given disciplinary action</p> <p>6 from the school.</p> <p>7 Q. Okay.</p> <p>8 So what do you know about</p> <p>9 suspensions? How --- how do they ---</p> <p>10 how do they usually come? How are</p> <p>11 they dispensed?</p> <p>12 A. By doing something that's</p> <p>13 against the school's, like, handbook</p> <p>14 codes.</p> <p>15 Q. Okay.</p> <p>16 And usually in --- in --- in</p> <p>17 chunks of three days or ten days.</p> <p>18 Right?</p> <p>19 A. Yeah. Like, one to ten.</p> <p>20 Q. Okay.</p> <p>21 So the fact that you were</p> <p>22 suspended for a day and a half is ---</p> <p>23 is not as bad as if you were suspended</p> <p>24 for three days.</p> <p>25 Isn't that correct?</p>
Page 99	Page 101
<p>1 A. Yes.</p> <p>2 Q. Okay.</p> <p>3 You came back on Monday?</p> <p>4 A. On Monday.</p> <p>5 Q. Right? So technically, you</p> <p>6 were suspended for a day and a half.</p> <p>7 Right?</p> <p>8 A. Yeah.</p> <p>9 Q. Okay.</p> <p>10 And a suspension is an excused</p> <p>11 absence because the school knows where</p> <p>12 you are.</p> <p>13 A. But it was a level three</p> <p>14 suspension.</p> <p>15 Q. Okay.</p> <p>16 It was a level three. And what</p> <p>17 does that mean in the long run? How</p> <p>18 did it affect your ability to get into</p> <p>19 Reading Area Community College?</p> <p>20 A. It didn't, but ---</p> <p>21 Q. Okay.</p> <p>22 A. --- I'm just --- but it could</p> <p>23 have. It --- it affects scholarships.</p> <p>24 Q. Well were you --- were you</p> <p>25 applying for scholarship?</p>	<p>1 A. Yes.</p> <p>2 Q. And it's certainly not as bad</p> <p>3 as it would've looked if you were</p> <p>4 suspended for ten days.</p> <p>5 Right?</p> <p>6 A. Yes.</p> <p>7 Q. Okay.</p> <p>8 A. But the level of it was pretty</p> <p>9 much as, like, being suspended for ten</p> <p>10 days. A level three suspension is for</p> <p>11 like, bringing a weapon to school,</p> <p>12 other like violent stuff.</p> <p>13 Q. So --- so talking --- but ---</p> <p>14 but also disrespect --- disrespect to</p> <p>15 a --- an administration or teaching</p> <p>16 staff is --- is also a pretty high</p> <p>17 level. It's a level four.</p> <p>18 Right?</p> <p>19 A. I don't know.</p> <p>20 Q. Okay.</p> <p>21 So if --- if you received a</p> <p>22 level three when actually you should</p> <p>23 have received a level four, Dr. Shank</p> <p>24 actually cut you a break, wouldn't you</p> <p>25 say?</p>

26 (Pages 98 to 101)

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<p>1 A. But I should not have received 2 a level four. I should not have 3 received a suspension at all. 4 Q. Well, okay. 5 But you don't get to make that 6 decision, do you? 7 A. But I didn't disrespect anyone. 8 Q. But you didn't disrespect them 9 intentionally, but they felt 10 disrespected? 11 A. I felt disrespected. 12 Q. Well okay. 13 But you don't get the 14 opportunity to suspend the 15 administrators or the teachers, but 16 they can, and they do have the 17 ability, to suspend or discipline you. 18 Right? 19 A. Yes. 20 Q. Not in --- it's not an equal 21 --- 22 A. yeah. 23 Q. --- relationship? 24 A. Uh-huh (yes). 25 Q. You agree? So you had a</p>	<p>1 Right? Here's what can happen 2 if you don't respect this Code of 3 Conduct. If you violate it, we can 4 discipline you. And you understand 5 that generally. 6 Right? 7 A. Yes. 8 Q. Okay. 9 So it seems to me that the 10 biggest problem you have with Mr. 11 Becker is that he didn't use the words 12 suspend when he gave you a day and a 13 half on the street? 14 A. Yes. 15 Q. Right. Okay. 16 Anything else that you have a 17 problem with Mr. Becker as you sit 18 here today? 19 A. No. 20 Q. Okay. 21 What about Dr. Shank? Why are 22 you suing her? 23 A. Because she called me out and 24 indirectly, well I guess --- I don't 25 know how to word it. She ---.</p>
Page 103	Page 105
<p>1 student handbook that maybe you open 2 and read from time to time, and maybe 3 you never read it. 4 Right? 5 A. Yeah. 6 Q. Okay. 7 But that handbook, would you 8 agree with me, is given for students 9 to give them some notice about what 10 could happen in the event they have a 11 meltdown of some kind. 12 Right? 13 A. I suppose. 14 Q. Okay. 15 So some students have meltdowns 16 where they become violent, and some 17 students just have meltdowns and are 18 disrespectful. 19 Right? Or there could be 20 meltdowns of various other causes and 21 character. 22 Right? 23 A. Okay 24 Q. Yes. So the Code of Conduct is 25 for the student's information,</p>	<p>1 Q. Now would be the time to word 2 it. 3 A. Yeah. She offended me, and she 4 called me out and pretty much told me 5 to leave. Well, she did tell me to 6 leave. 7 Q. Did she do anything else 8 besides that that caused you to file a 9 lawsuit against her? 10 A. She was working with Mrs. 11 Lyons. 12 Q. Okay. 13 And what did she work with Mrs. 14 Lyons to do? 15 A. The email. 16 Q. The email that Mrs. Lyons sent 17 to parents? 18 A. Uh-huh (yes). 19 Q. Okay. 20 A. Because it said that she was 21 working closely with Dr. Shank. 22 Q. That was true. 23 Okay. 24 Look at Exhibit 4 that we have 25 previously marked at Plaintiff 1.</p>

27 (Pages 102 to 105)

Page 106	Page 108
<p>1 2 (Whereupon, Plaintiff's 3 Exhibit 4, Musical 4 Production Team 5 Expectations Letter, was 6 marked for 7 identification.) 8 9 BY ATTORNEY O'DONNELL: 10 Q. And take a look at that, and 11 tell me whether or not you've seen 12 that before today. 13 A. I've not seen this before. 14 Q. Okay. 15 Well take your time and read 16 it. 17 18 (WHEREUPON, WITNESS COMPLIES.) 19 20 BY ATTORNEY O'DONNELL: 21 Q. Do you see what the date of 22 this is? 23 A. Yes. 24 Q. What is it? 25 A. It is the day after the School</p>	<p>1 Q. The reasonable expectation is 2 not more than 15 minutes. Do you see 3 that? 4 A. Yes. 5 Q. So that addresses one of the 6 concerns that you --- that you 7 expressed at the School Board meeting. 8 Right? 9 A. Yes. 10 Q. Okay 11 All of these paragraphs that 12 --- that follow paragraph one, through 13 11, address, and even beyond some of 14 the problems that you expressed to the 15 School Board the --- the --- the day 16 before. 17 Correct? 18 A. Yes. 19 Q. Yes. So now that Dr. Shank has 20 taken the time to write this letter to 21 Mrs. Lyons and address most, if not 22 all, and maybe even beyond all of the 23 problems that you, and Jordan, and 24 Vinny expressed along with the parents 25 at the School Board meeting, doesn't</p>
Page 107	Page 109
<p>1 Board meeting. 2 Q. Okay 3 And what do you understand this 4 letter to be? 5 A. Expectations that the 6 production team must follow. 7 Q. Okay. 8 And this --- well right, that's 9 what it says. 10 A. Right. 11 Q. Expectations for the Musical 12 Production Team, but you've read it. 13 And --- and do you have a sense for 14 what Dr. Shank is trying to accomplish 15 here? 16 A. She's trying to, like, get rid 17 of the bias and make the drama club 18 better. 19 Q. Okay. 20 Now notice that she says in 21 another --- in paragraph one, 22 rehearsals are to begin and end as 23 close to on time as possible? Would 24 you --- yes you see that? 25 A. Yes.</p>	<p>1 this solve the problem? 2 A. Yes and no. 3 Q. Okay. 4 And tell me why no. 5 A. Because if someone isn't there 6 to watch Mrs. Lyons, who knows that 7 she's following the rules, those 8 expectations? 9 Q. All right. 10 A. Like yes, they were written to 11 change what --- about --- to make 12 changes for the drama club, like as we 13 requested. 14 Q. Right. 15 A. But just because they were 16 written, does not mean that they were 17 going to be followed. 18 Q. Similar to the student Code of 19 Conduct, would you agree? 20 A. I suppose. Yeah. 21 Q. Okay. 22 ATTORNEY O'DONNELL: 23 Those are all the 24 questions I have. Thank you, 25 Haley.</p>

28 (Pages 106 to 109)

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<p>1 2 EXAMINATION 3 4 BY ATTORNEY READY: 5 Q. I have a few questions for you. 6 The — the email on March 20th that 7 you, that we talked about earlier. I 8 think it's been pre-marked as an 9 exhibit. Did other students know 10 about the email? 11 A. Yes. 12 Q. And did you hear from them 13 about it? 14 A. I did not because that day we 15 had been removed early. I only heard 16 about it from Jordan. 17 Q. Okay. 18 You mentioned that Jordan was 19 standing around and talking to some 20 people after the School Board meeting. 21 Who — who was he talking to? 22 A. He would talk to Jared 23 Mazeika's parents. Talked to Ralphie 24 Forsyth. Talked to someone else that 25 I don't remember.</p>	<p>1 So basically from the spring 2 semester of your freshman year until 3 this incident. 4 Correct? 5 A. Yeah. 6 Q. Okay. 7 You talked about it a little 8 bit, but what did you hope was going 9 to come out at that School Board 10 meeting on March 20th? 11 A. I wanted Mrs. Lyons to get 12 oversight and to make sure she was not 13 — she was — she — like, being 14 professionals with the students and 15 that she was — sorry. That she was 16 being professional and unbiased, and 17 just giving like good ability to teach 18 us. 19 Q. And why did you go to a School 20 Board meeting for that discussion? 21 A. Because I believed that they 22 could make a change and help us. And 23 help her. 24 Q. After the School Board meeting, 25 you mentioned that Jordan and Mrs.</p>
Page 111	Page 113
<p>1 Q. Did he talk to these School 2 Board members? 3 A. I don't believe so. 4 Q. He talked to Jared's parents 5 you said. Do you know what they 6 talked about? 7 A. He had talked about how he 8 didn't — he wasn't trying to harm 9 Jared, and that he didn't want this to 10 get out of proportion. 11 Q. And did — do you remember 12 what Jared's parents response was? 13 A. I don't. 14 Q. Okay. 15 How long were you in the drama 16 program? 17 A. I was in it for my freshman 18 musical up to my senior play. So 19 like, one, two, like about three 20 years. 21 Q. Freshman musical I guess comes 22 — musicals happen in the spring. 23 Is that right? 24 A. Yeah. 25 Q. Okay.</p>	<p>1 Lyons spoke in the hallway. Did you 2 — you said you didn't hear that, 3 meaning that you weren't present for 4 it. Did you witness their 5 interactions during that meeting at 6 all? 7 A. I did not. 8 Q. Okay. 9 I kind of want to just clear 10 this up from earlier. You — you 11 said the thing, I think there was 12 confusion because you said well if 13 there was a suspension, you know, I 14 wouldn't — I — I would've come 15 back to school. And I think Ms. 16 O'Donnell kind of asked you, you know, 17 then you wouldn't have been allowed to 18 come back to school. 19 What — what did you mean by 20 that statement that if there was a 21 suspension you would've come back to 22 school? 23 A. Well if he would've told me 24 that to — for it to be excused, he 25 was going to suspend me, then I</p>

29 (Pages 110 to 113)

Page 114	Page 116
<p>1 would've come to school instead of 2 getting the suspension. 3 Q. Tell me about how this, all 4 this has affected --- has affected you 5 with your relationship with your 6 friends at school. 7 A. A lot of people have stopped 8 talking to me. During school, pretty 9 much no one talked to me. Even the 10 people who are my friends now, they 11 didn't want to talk to me during the 12 musical because they were afraid that 13 like, they were going to be bullied 14 from the other cast mates. 15 Q. Not being in this play, how did 16 that --- how did that affect you? 17 A. Well I --- I want to go into 18 performing. I am going to RAC to get 19 my general education so I can transfer 20 to Rider to get a degree in theater. 21 So it really affected me because it's 22 my last --- it was my last year of 23 high school and I thought it was going 24 to be something amazing. And it 25 turned into something tragic.</p>	<p>1 video. 2 ATTORNEY O'DONNELL: 3 No. The --- of the 4 fruit? 5 THE WITNESS: 6 The fruit. 7 ATTORNEY READY: 8 Yes. 9 ATTORNEY O'DONNELL: 10 No. 11 ATTORNEY READY: 12 Okay. 13 I --- it's up to you. 14 We really, we can have it 15 identified either in some other 16 way or we can show it now and 17 have her identify it. Would 18 that be easier for you? 19 ATTORNEY O'DONNELL: 20 I don't --- I don't have 21 a preference. 22 ATTORNEY READY: 23 Okay. All right. 24 I'm going to show it, 25 and you just tell me if this is</p>
Page 115	Page 117
<p>1 Q. Okay. 2 The meeting with Mr. Becker, I 3 mean, you said that he didn't mention 4 suspending you. Did he mention at any 5 point levels one, two, three, or four 6 during that meeting? 7 A. No. Not at all. 8 Q. Did he mention at any point 9 that he was considering any discipline 10 for you at that time? 11 A. No. 12 Q. I'm going to show you --- I'm 13 sorry. Give me one second here. I'll 14 try to put this in a place where we 15 can all view it. I'm going to show 16 you a video, and I think this is the 17 video that we're referring to. 18 ATTORNEY READY: 19 Have you --- have you 20 seen this? 21 ATTORNEY O'DONNELL: 22 What video are you 23 referring to? 24 ATTORNEY READY: 25 This is a Snapchat</p>	<p>1 the video we were discussing 2 earlier. I'm sorry, it's --- 3 there's no sound on it. 4 ATTORNEY O'DONNELL: 5 So --- so for the 6 record, all we're doing is --- 7 is looking at a video without 8 audio. 9 ATTORNEY READY: 10 Well let me see if I can 11 fix that. I apologize, I'm 12 going to start this from the 13 beginning for you. 14 Okay? 15 16 (WHEREUPON, A VIDEO RECORDING WAS 17 PLAYED.) 18 19 BY ATTORNEY READY: 20 Q. Okay. 21 Is this the video that you were 22 discussing earlier? 23 Okay. 24 A. Yes it was. 25 Q. All right.</p>

30 (Pages 114 to 117)

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<p>1 At that time, were you aware 2 that Jared Mazeika was alerted to some 3 of the items in this video? 4 A. While taking the video, I 5 wasn't thinking about his allergies. 6 I wasn't even thinking about him. I 7 was just thinking that Jordan's funny. 8 Q. Okay. 9 At the time that this video was 10 posted, what was your relationship 11 like with Jared? Yours personally. 12 A. With Jared? We were kind of 13 friends, but we had like slowly 14 stopped being friends while this was 15 all happening. I tried to be friends 16 with him for a while, like and give 17 him support throughout the show. And 18 then, that all changed when he threw a 19 binder at me. 20 Q. Okay. 21 Was the binder incident before 22 or after this video was posted? 23 A. After. 24 Q. It was after? Okay. 25 And that's when your</p>	<p>1 that --- that you said that you'd want 2 to share here? 3 A. I talked about how I brought up 4 the binder situation, and that Mrs. 5 Lyons --- and then I was dismissed 6 because I wasn't allowed to character 7 assassinate. And then I brought up 8 how rehearsals were not taken care of 9 professionally. I also talked about 10 how I --- she accused Jordan of 11 abusing me, and how I wanted the drama 12 club to feel like home again. And I 13 believe that's it. 14 Q. Okay. 15 For the record, has Jordan ever 16 abused you? 17 A. No. 18 Q. Has he ever kept you from 19 eating? 20 A. No. 21 Q. Okay. 22 Did --- at the School Board 23 meeting ---? 24 A. Obviously not. 25 Q. At the School Board meeting,</p>
Page 119	Page 121
<p>1 relationship with --- changed with 2 him. 3 Is that right? 4 A. Yes. 5 Q. Did Jared come to you about 6 this video with his concerns? 7 A. No. 8 Q. Okay. 9 To your knowledge, did Jordan 10 share it --- did Jared share it with 11 Jordan concerns about this video? 12 A. No. 13 Q. Okay. 14 Did you mean to make anyone 15 afraid by the sharing of this video? 16 A. No. 17 Q. Okay. 18 Did you mean to hurt Jared 19 personally by the sharing of this 20 video? 21 A. No. 22 Q. Okay. 23 You discussed a little bit 24 about what you said at the School 25 Board meeting. Is there anything else</p>	<p>1 did other students use names to refer 2 to individuals specifically? 3 A. Yes. They --- when they talked 4 about Mrs. Lyons, they talked about 5 her positively, but they were able to 6 say her name. 7 Q. Okay. 8 No one from the School Board 9 interrupted them and said no names 10 about it at that point? 11 A. No. 12 Q. Okay. 13 To your best of your 14 recollection, were there any other 15 people referred to by name during this 16 time? 17 A. I don't think so, but I'm not 18 100 percent sure. 19 Q. Okay. Okay. 20 The meeting with Misses --- 21 with Mr. Becker at which you were told 22 to go home, you were referred over to 23 that meeting by whom? 24 A. To --- by Ms. Boardly the 25 guidance counselor.</p>

31 (Pages 118 to 121)

<p style="text-align: right;">Page 122</p> <p>1 Q. Okay.</p> <p>2 And why did you --- you went</p> <p>3 --- did you --- you went to guidance</p> <p>4 voluntarily?</p> <p>5 A. Yes.</p> <p>6 Q. Okay.</p> <p>7 A. Because I was very emotionally</p> <p>8 upset and I thought they could like</p> <p>9 counsel me.</p> <p>10 Q. Okay.</p> <p>11 ATTORNEY REALY:</p> <p>12 Nothing further.</p> <p>13 ATTORNEY O'DONNELL:</p> <p>14 Nothing further. Thank</p> <p>15 you, Haley.</p> <p>16 COURT REPORTER:</p> <p>17 Would Counsels like a</p> <p>18 transcript then?</p> <p>19 ATTORNEY READY:</p> <p>20 Yes.</p> <p>21 ATTORNEY O'DONNELL:</p> <p>22 Yes, please.</p> <p>23 *****</p> <p>24 DEPOSITION CONCLUDED AT 1:32 P.M.</p> <p>25 *****</p>	
<p style="text-align: right;">Page 123</p> <p>1 COMMONWEALTH OF PENNSYLVANIA)</p> <p>2 COUNTY OF BERKS)</p> <p>3 CERTIFICATE</p> <p>4 I, Ian Weeber, a Notary Public in and</p> <p>5 for the Commonwealth of Pennsylvania, do</p> <p>6 hereby certify:</p> <p>7 That the witness, Haley Hartline,</p> <p>8 whose testimony appears in the foregoing</p> <p>9 deposition, was duly sworn by me on 09/26/2019</p> <p>10 and that the transcribed deposition of said</p> <p>11 witness is a true record of the testimony</p> <p>12 given by said witness;</p> <p>13 That the proceeding is herein recorded</p> <p>14 fully and accurately;</p> <p>15 That I am neither attorney nor counsel</p> <p>16 for, nor related to any of the parties to the</p> <p>17 action in which these depositions were taken,</p> <p>18 and further that I am not a relative of any</p> <p>19 attorney or counsel employed by the parties</p> <p>20 hereto, or financially interested in this</p> <p>21 action.</p> <p>22 Dated the 6th day of November, 2019</p> <p>23 <i>Glen Dale Weeber</i></p> <p>24 Ian Weeber,</p> <p>25 Court Reporter</p>	

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT
OF PENNSYLVANIA

* * * * *

JORDAN ECK, HALEY *
HARTLINE, and *Case No.
VINCENT FERRIZZI, *5:19-CV-1873-MAK
Plaintiffs *
vs. *
OLEY VALLEY SCHOOL *
DISTRICT; TRACY *
SHANK, individually; *
CHRISTOPHER M. *
BECKER, individually; *
and STACY LYONS, *
individually, *
Defendants *

* * * * *

DEPOSITION OF
VINCENT FERRIZZI
September 26, 2019

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1	DEPOSITION	1	I N D E X
2	OF	2	
3	VINCENT FERRIZZI, taken on behalf of	3	WITNESS: VINCENT FERRIZZI
4	the Defendants herein, pursuant to the	4	EXAMINATION
5	Rules of Civil Procedure, taken before	5	By Attorney O'Donnell 7 - 122
6	me, the undersigned, Ian Dale Weeber,	6	EXAMINATION
7	a Court Reporter and Notary Public in	7	By Attorney Ready 122 - 130
8	and for the Commonwealth of	8	REEXAMINATION
9	Pennsylvania, at Berks County Bar	9	By Attorney O'Donnell 130 - 132
10	Association, 544 Court Street,	10	REEXAMINATION
11	Reading, Pennsylvania, on Thursday,	11	By Attorney Ready 132 - 134
12	September 26, 2019 beginning at 9:49	12	REEXAMINATION
13	a.m.	13	By Attorney O'Donnell 134 - 135
14		14	DISCUSSION AMONG PARTIES 135 - 136
15		15	CERTIFICATE 137
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25		25	

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1	A P P E A R A N C E S	1	EXHIBIT PAGE
2		2	
3	JOEL A. READY, ESQUIRE	3	PAGE
4	Cornerstone Law Firm, LLC	4	NUMBER DESCRIPTION IDENTIFIED
5	8500 Allentown Pike	5	1 Musical Production
6	Suite 3	6	Team Expectations
7	Blandon, PA 19510	7	Letter 119
8	COUNSEL FOR PLAINTIFFS	8	
9		9	
10	SHARON M. O'DONNELL, ESQUIRE	10	
11	Marshall, Dennehey, Warner, Coleman &	11	
12	Goggin, P.C.	12	
13	100 Corporate Center Drive	13	
14	Suite 201	14	
15	Camp Hill, PA 17011	15	
16	COUNSEL FOR DEFENDANTS	16	
17		17	
18		18	
19		19	
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<p>1 OBJECTION PAGE</p> <p>2</p> <p>3 ATTORNEY PAGE</p> <p>4 Ready 21, 22</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 about the facts giving rise to the</p> <p>2 lawsuit.</p> <p>3 A. Okay.</p> <p>4 Q. Before we start, before I start</p> <p>5 asking you the questions, I'm going to</p> <p>6 give you some instructions on how to</p> <p>7 respond to my questions. First is, if</p> <p>8 for some reason you don't understand a</p> <p>9 question that I ask, please don't</p> <p>10 answer it. Please ask me to repeat it</p> <p>11 or rephrase it because if you answer a</p> <p>12 question that I ask, I'm going to</p> <p>13 assume that you both understood it and</p> <p>14 heard it, and that the answer that you</p> <p>15 give is the answer that you mean to.</p> <p>16 Okay?</p> <p>17 A. Okay.</p> <p>18 Q. Secondly, I'd like you to</p> <p>19 refrain from using physical gestures</p> <p>20 to answer my questions. You'll need</p> <p>21 to respond in words that can be</p> <p>22 spelled. So if your answer's in the</p> <p>23 affirmative, say yes. If it's a</p> <p>24 negative, say no. If you don't know</p> <p>25 the answer to a question, say I don't</p>
Page 7	Page 9
<p>1 STIPULATION</p> <p>2</p> <p>3 (It is hereby stipulated and agreed by</p> <p>4 and between counsel for the respective</p> <p>5 parties that reading, signing,</p> <p>6 sealing, certification and filing are</p> <p>7 not waived.)</p> <p>8</p> <p>9 PROCEEDINGS</p> <p>10</p> <p>11 VINCENT FERRIZZI,</p> <p>12 CALLED AS A WITNESS IN THE FOLLOWING</p> <p>13 PROCEEDING, AND HAVING FIRST BEEN DULY</p> <p>14 SWORN, TESTIFIED AND SAID AS FOLLOWS:</p> <p>15</p> <p>16 EXAMINATION</p> <p>17</p> <p>18 BY ATTORNEY O'DONNELL:</p> <p>19 Q. Good morning, Mr. Ferrizzi. My</p> <p>20 name is Sharon O'Donnell, and I</p> <p>21 represent the Oley Valley School</p> <p>22 District in a federal lawsuit that you</p> <p>23 brought along with some other people</p> <p>24 against the district. And today, I'm</p> <p>25 going to be asking you some questions</p>	<p>1 know or if you don't remember --- you</p> <p>2 knew at some point, you just don't</p> <p>3 remember now, just tell me you don't</p> <p>4 remember and that's a fair answer.</p> <p>5 Okay?</p> <p>6 A. Okay.</p> <p>7 Q. Are you taking any medications</p> <p>8 that would prevent you from testifying</p> <p>9 truthfully or understanding my</p> <p>10 questions as we go through this</p> <p>11 deposition?</p> <p>12 A. No.</p> <p>13 Q. Have you taken anything this</p> <p>14 morning that would prevent you from</p> <p>15 fully understanding a question and</p> <p>16 answering it truthfully?</p> <p>17 A. No.</p> <p>18 Q. Do you understand that you're</p> <p>19 under oath during the course of your</p> <p>20 testimony?</p> <p>21 A. Yes.</p> <p>22 Q. Do you understand what that</p> <p>23 means?</p> <p>24 A. Yes.</p> <p>25 Q. Okay.</p>

3 (Pages 6 to 9)

Page 10	Page 12
<p>1 What does it mean?</p> <p>2 A. It means I have to say --</p> <p>3 speak my truth, the truth, and nothing</p> <p>4 but the truth.</p> <p>5 Q. Well does the truth mean to</p> <p>6 you?</p> <p>7 A. The truth is events that have</p> <p>8 happened and whatever I can say to --</p> <p>9 what's the word? Sorry. Sorry.</p> <p>10 Speaking the truth.</p> <p>11 Q. Is that your answer?</p> <p>12 A. Yeah.</p> <p>13 Q. What I'll like you to do is try</p> <p>14 to recall the facts as accurately as</p> <p>15 possible. Don't guess, don't</p> <p>16 speculate. You can't ask your</p> <p>17 attorney for help answering a</p> <p>18 question, but you can ask for a break</p> <p>19 between questions.</p> <p>20 Do you understand that?</p> <p>21 A. Yes.</p> <p>22 Q. Do you understand what perjury</p> <p>23 is?</p> <p>24 A. Yes.</p> <p>25 Q. Okay.</p>	<p>1 Would you full --- state your</p> <p>2 full name for the record, please?</p> <p>3 A. Vincent Sabito Ferrizzi.</p> <p>4 Q. And do you currently reside at</p> <p>5 41 Glenview Drive in Fleetwood?</p> <p>6 A. Yes.</p> <p>7 Q. Okay.</p> <p>8 And your date of birth is March</p> <p>9 14th of 2001?</p> <p>10 A. Yes.</p> <p>11 Q. How old are you today?</p> <p>12 A. I'm 18.</p> <p>13 Q. And are you presently enrolled</p> <p>14 in your freshman year in Lebanon</p> <p>15 Valley College?</p> <p>16 A. Yes.</p> <p>17 Q. And what is your major?</p> <p>18 A. Biology education.</p> <p>19 Q. And when did you start Lebanon</p> <p>20 Valley?</p> <p>21 A. I started August 16th.</p> <p>22 Q. Of this year.</p> <p>23 Right?</p> <p>24 A. Yes.</p> <p>25 Q. What date did you graduate from</p>
Page 11	Page 13
<p>1 Do you understand there are</p> <p>2 consequences of perjury?</p> <p>3 A. Yes.</p> <p>4 Q. One final instruction.</p> <p>5 Depositions tend to become</p> <p>6 conversational. I'm going to ask you</p> <p>7 to allow me to ask my question fully</p> <p>8 before you start to answer.</p> <p>9 A. Okay.</p> <p>10 Q. Depending on the way you answer</p> <p>11 questions, I may assume that you're</p> <p>12 finished with your answer, and you may</p> <p>13 not be. If you're not, I don't intend</p> <p>14 to interrupt you, but your body</p> <p>15 language or your facial expressions</p> <p>16 may suggest that you're finished.</p> <p>17 So I'm just going to ask you to</p> <p>18 indulge me. If you're not finished,</p> <p>19 simply tell me that you're not</p> <p>20 finished and I'll give you as much</p> <p>21 time to answer a question as you'd</p> <p>22 like to.</p> <p>23 Okay?</p> <p>24 A. Okay.</p> <p>25 Q. All right.</p>	<p>1 Oley Valley?</p> <p>2 A. I believe it was June 5th,</p> <p>3 2019.</p> <p>4 Q. Okay.</p> <p>5 We're here to talk about a</p> <p>6 lawsuit that you filed against the</p> <p>7 Oley Valley School District and some</p> <p>8 individuals who either used to work</p> <p>9 there or still work there.</p> <p>10 Christopher Becker, Stacey Lyons, and</p> <p>11 Tracey Shank. Tell me why you're</p> <p>12 suing -- suing Dr. Shank.</p> <p>13 A. I feel like my rights were</p> <p>14 violated during the night --- School</p> <p>15 Board meeting on March 20th. And I've</p> <p>16 -- I had problems that day, and I</p> <p>17 needed help in the systems and there</p> <p>18 was no one in the building to help or</p> <p>19 assist me.</p> <p>20 Q. Okay.</p> <p>21 So your rights were violated.</p> <p>22 Which rights were they?</p> <p>23 A. My 1st and 14th Amendment.</p> <p>24 Q. And what do you understand your</p> <p>25 1st amendment rights to be?</p>

4 (Pages 10 to 13)

Page 14	Page 16
<p>1 A. Freedom of speech.</p> <p>2 Q. Do you believe that your right</p> <p>3 to speak are unconditional?</p> <p>4 A. Can you repeat, please?</p> <p>5 Q. Sure. Do you believe that your</p> <p>6 right to speak is unconditional?</p> <p>7 A. What does that mean? Sorry.</p> <p>8 Q. Do you know what the word</p> <p>9 unconditional means?</p> <p>10 A. No.</p> <p>11 Q. Without conditions. Without</p> <p>12 restrictions.</p> <p>13 A. Yeah, sorry. Yeah.</p> <p>14 Q. Do you understand --- so what</p> <p>15 --- what are you saying yes to?</p> <p>16 A. The question.</p> <p>17 Q. Do you believe that your</p> <p>18 freedom of speech is unconditional or</p> <p>19 unrestricted?</p> <p>20 A. No.</p> <p>21 Q. No?</p> <p>22 A. Sorry.</p> <p>23 Q. And what do you think the</p> <p>24 restrictions are in your speech?</p> <p>25 A. I don't understand.</p>	<p>1 guidance, and there was no one in</p> <p>2 guidance. Because I just --- I</p> <p>3 believed I knew the email was not ---</p> <p>4 was fake, and that all the information</p> <p>5 that was presented was ---.</p> <p>6 Q. I knew that the email was ---?</p> <p>7 A. I --- it was not true. And the</p> <p>8 things that Ms. Lyons said in this</p> <p>9 email was referring to my friend</p> <p>10 Jordan. And everyone knew it, and I</p> <p>11 felt like that was completely</p> <p>12 unprofessional, how she approached the</p> <p>13 situation and how she was trying to</p> <p>14 get people to come and support her,</p> <p>15 other students, to the School Board</p> <p>16 meeting. And I went to all around the</p> <p>17 school. There was no one who was ---</p> <p>18 who was able to, like, help me out.</p> <p>19 And I ---.</p> <p>20 ATTORNEY READY:</p> <p>21 You have to speak up a</p> <p>22 little bit.</p> <p>23 THE WITNESS:</p> <p>24 I'm sorry.</p> <p>25 BY ATTORNEY O'DONNELL:</p>
Page 15	Page 17
<p>1 Q. Do you understand that there</p> <p>2 are some restrictions on your speech?</p> <p>3 A. Yes.</p> <p>4 Q. Okay.</p> <p>5 Do you know what those</p> <p>6 restrictions are?</p> <p>7 A. No.</p> <p>8 Q. Did anyone ever tell you that</p> <p>9 there's restrictions on freedom of</p> <p>10 speech?</p> <p>11 A. No.</p> <p>12 Q. You said that your 14th</p> <p>13 amendment right was violated. Which</p> <p>14 14th amendment right was that?</p> <p>15 A. I don't remember.</p> <p>16 Q. Did you ever know?</p> <p>17 A. No.</p> <p>18 Q. You said you had problems that</p> <p>19 day, the day of the Board meeting,</p> <p>20 March 20th of 2019. What problems</p> <p>21 were they?</p> <p>22 A. When the defamation email was</p> <p>23 sent out, I went to the office to</p> <p>24 report it and no one in the office was</p> <p>25 able to report it. So then I went to</p>	<p>1 Q. And speak slower. So take your</p> <p>2 time. Take a breath, and speak</p> <p>3 slowly.</p> <p>4 A. Thanks.</p> <p>5 Q. All right.</p> <p>6 So let's --- let's start at the</p> <p>7 beginning.</p> <p>8 A. Okay.</p> <p>9 Q. You were running around, trying</p> <p>10 to --- trying --- trying to find help?</p> <p>11 A. Trying to find help because I</p> <p>12 was emotionally unstable when I read</p> <p>13 that email, knowing that the email</p> <p>14 that was sent was untruthful and</p> <p>15 unprofessional and I couldn't believe,</p> <p>16 like, that Mrs. Lyons would send an</p> <p>17 email to selected parents of students</p> <p>18 about certain --- Jordan, his mom's in</p> <p>19 the --- going to the School Board</p> <p>20 meetings. And her --- the names</p> <p>21 weren't stated, but everyone knew,</p> <p>22 insisted, and who was actually the ---</p> <p>23 the personification in that message.</p> <p>24 Q. So a couple of things. Did you</p> <p>25 receive that email?</p>

5 (Pages 14 to 17)

Page 18	Page 20
<p>1 A. I did not.</p> <p>2 Q. Did your parents receive that</p> <p>3 email?</p> <p>4 A. They did not.</p> <p>5 Q. How did you get that email?</p> <p>6 A. My friend Alyssa Madioli told</p> <p>7 me and showed me.</p> <p>8 Q. Did Alyssa's parents receive</p> <p>9 it?</p> <p>10 A. Yes.</p> <p>11 Q. So your name was not on the</p> <p>12 email, and it was not directed to you?</p> <p>13 A. No.</p> <p>14 Q. What business did you have</p> <p>15 having it?</p> <p>16 A. It's --- Jordan Eck is one of</p> <p>17 my best friends. And I know the</p> <p>18 things that he was going through with</p> <p>19 Ms. Lyons this year. It's in the</p> <p>20 things I see her do on accident ---</p> <p>21 were falsifiable and untruthful. And</p> <p>22 I see her make up stories and lies</p> <p>23 just to benefit --- for her own</p> <p>24 benefit.</p> <p>25 Q. Okay.</p>	<p>1 have.</p> <p>2 Is that right?</p> <p>3 A. Yes.</p> <p>4 Q. But you have it, and you want</p> <p>5 help from someone that has authority</p> <p>6 over Mrs. Lyons?</p> <p>7 A. Yes.</p> <p>8 Q. And who do you think has</p> <p>9 authority over Mrs. Lyons? Who does</p> <p>10 she report to?</p> <p>11 A. Mr. Becker and Dr. Shank.</p> <p>12 Q. Did you go to Mr. Becker's</p> <p>13 office?</p> <p>14 A. Yes. He was not there so I</p> <p>15 wrote a report or a complaint.</p> <p>16 Q. You left a complaint with his</p> <p>17 secretary?</p> <p>18 A. Yes.</p> <p>19 Q. And after you left a complaint</p> <p>20 with his --- a written complaint with</p> <p>21 his secretary, then what did you do?</p> <p>22 A. I walked out and went back to</p> <p>23 my 5th period class.</p> <p>24 Q. So you said earlier, problems</p> <p>25 that day --- you're suing Dr. Shank</p>
Page 19	Page 21
<p>1 I want to go back to the email.</p> <p>2 It wasn't ---</p> <p>3 A. Okay.</p> <p>4 Q. --- directed to you?</p> <p>5 A. No.</p> <p>6 Q. Is --- is there some reason why</p> <p>7 you felt like you should have</p> <p>8 possession of this email?</p> <p>9 A. No.</p> <p>10 Q. So you were running around the</p> <p>11 school that day with an email that was</p> <p>12 never directed to you written by Mrs.</p> <p>13 Lyons. Who is Mrs. Lyons?</p> <p>14 A. She's the high school drama</p> <p>15 director.</p> <p>16 Q. Is she also a teacher?</p> <p>17 A. No.</p> <p>18 Q. So her only job there is to</p> <p>19 direct school plays?</p> <p>20 A. Correct.</p> <p>21 Q. So as I'm understanding this,</p> <p>22 you take it upon yourself to help out</p> <p>23 your friend Jordan by running around</p> <p>24 with an email that was never directed</p> <p>25 to you, and never intended for you to</p>	<p>1 --- well part of you --- you're suing</p> <p>2 --- yeah, Dr. Shank because you had</p> <p>3 problems that day with an email that</p> <p>4 you had that was not directed to you</p> <p>5 and should not have been in your hands</p> <p>6 to begin with. Left a message with</p> <p>7 the supervisor of the person who wrote</p> <p>8 that with a complaint. And again, I'm</p> <p>9 not sure what exactly Dr. Shank had to</p> <p>10 do with any of that.</p> <p>11 ATTORNEY READY:</p> <p>12 I'm going to object to</p> <p>13 form.</p> <p>14 BY ATTORNEY O'DONNELL:</p> <p>15 Q. You're going to tell me what</p> <p>16 Dr. Shank had to do with that.</p> <p>17 A. I'm not --- I'm not the</p> <p>18 individual who's suing her exactly.</p> <p>19 That's more Jordan Eck's. He's ---</p> <p>20 what happened to him is why he's suing</p> <p>21 her.</p> <p>22 Q. Okay.</p> <p>23 So you're not --- you don't</p> <p>24 really have a problem with Dr. Shank.</p> <p>25 Right?</p>

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<p>1 A. No.</p> <p>2 Q. Okay.</p> <p>3 What problem do you have with</p> <p>4 Mr. Becker?</p> <p>5 A. Nothing.</p> <p>6 Q. What problem --- okay. So you</p> <p>7 have no claim against Dr. Shank and</p> <p>8 you have no claim against Mr. Becker?</p> <p>9 ATTORNEY READY:</p> <p>10 Object to the form</p> <p>11 again.</p> <p>12 BY ATTORNEY O'DONNELL:</p> <p>13 Q. Is that true?</p> <p>14 A. I was upset that several times</p> <p>15 when I needed to help, there was no</p> <p>16 one in administration that could help</p> <p>17 me or do anything about the situations</p> <p>18 about Ms. Lyons.</p> <p>19 Q. Okay.</p> <p>20 But this is a lawsuit.</p> <p>21 A. Yeah.</p> <p>22 Q. And there has to be something</p> <p>23 illegal about what they did. And</p> <p>24 helping you out with Mrs. Lyons in the</p> <p>25 drama club is not --- whether they</p>	<p>1 Right? It's not nice. It's</p> <p>2 wrong, but it's not illegal.</p> <p>3 Right? People are humiliated</p> <p>4 in public all the time, and they do it</p> <p>5 themselves and they do it to</p> <p>6 themselves.</p> <p>7 Right?</p> <p>8 A. Yes.</p> <p>9 Q. Okay.</p> <p>10 So you can't commit a crime</p> <p>11 against yourself. How can you commit</p> <p>12 a crime against another person or a</p> <p>13 wrong that you would sue someone in</p> <p>14 federal court for humiliating you in</p> <p>15 public?</p> <p>16 A. I don't know.</p> <p>17 Q. Neither do I.</p> <p>18 Okay.</p> <p>19 So we agree on that. What</p> <p>20 about bullying? What kind of bullying</p> <p>21 did she do?</p> <p>22 A. How she called me --- well</p> <p>23 first of all, she called me out twice.</p> <p>24 And then the defamation email which I</p> <p>25 saw against Jordan Eck. And then the</p>
Page 23	Page 25
<p>1 help you out or not help you is not</p> <p>2 illegal. This is a federal lawsuit</p> <p>3 and federal litigation. We take our</p> <p>4 jobs very seriously.</p> <p>5 So what --- what did --- so</p> <p>6 you're telling me Dr. Shank, as far as</p> <p>7 you know, did nothing illegal to cause</p> <p>8 you to sue her in this federal</p> <p>9 lawsuit?</p> <p>10 Is that correct?</p> <p>11 A. Yes.</p> <p>12 Q. And neither did Mr. Becker? He</p> <p>13 did nothing illegal that would cause</p> <p>14 you to sue him in a federal lawsuit?</p> <p>15 A. Yes.</p> <p>16 Q. Is that correct?</p> <p>17 A. Yes.</p> <p>18 Q. Okay.</p> <p>19 What did Mrs. Lyons do that was</p> <p>20 illegal?</p> <p>21 A. I was publicly humiliated and</p> <p>22 bullied by the director.</p> <p>23 Q. Okay.</p> <p>24 Publicly --- public humiliation</p> <p>25 is not illegal.</p>	<p>1 night of the cast party, when we had</p> <p>2 --- she gave nice comments about</p> <p>3 everyone to our happy papers, but she</p> <p>4 got to me. She literally said, I'll</p> <p>5 never forget you for what you said,</p> <p>6 but maybe it could be a life lesson to</p> <p>7 you in front of the whole entire cast.</p> <p>8 And that following morning, I</p> <p>9 showed up to the cast --- the set ---</p> <p>10 set cleanup, which is mandatory. And</p> <p>11 I was there for a whole ten minutes</p> <p>12 and she asked me to come into the</p> <p>13 auditorium lobby. So I followed her,</p> <p>14 and she told me that I was --- well I</p> <p>15 am a --- this is paraphrased, I talked</p> <p>16 to Dr. Shank and it'd be best for ---</p> <p>17 it's best if you leave the school</p> <p>18 premises because of things that were</p> <p>19 said last night. And then I was</p> <p>20 escorted by three adult men.</p> <p>21 And I had no say in what I said</p> <p>22 or I didn't --- I had no proof,</p> <p>23 there's no proof of what I said</p> <p>24 either.</p> <p>25 Q. Okay.</p>

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<p>1 I wrote a bunch of stuff down. 2 I'm not sure I got it all, but if I 3 don't get it all, you'll tell me. She 4 called me out twice. What does that 5 mean? 6 A. I was --- I --- first time I 7 was called out, it was the last drama 8 meeting of my junior year and we were 9 talking about the stuff we do for next 10 year. And I went to a School Board 11 meeting previously that year about 12 school recognition. 13 It's completely un-talked 14 about, drama club. And I mentioned 15 drama club so I went to talk about the 16 --- I went to a School Board meeting 17 to act about --- talk about school 18 recognition, and how we could get the 19 club to get more recognized or not. 20 And then she lashed it out at 21 me, saying don't ever go over my head 22 again, basically. 23 And the second time was during 24 --- 25 Q. Stop. Wait.</p>	<p>1 a display board of like all the 2 organizations and clubs. And how it 3 can recognize, like not just you know, 4 basketball sports or it could 5 recognize the art, music, and we have 6 a faith program. And have like a 7 display board displaying all of like 8 the accomplishments that we do and 9 have more recognition amongst that. 10 Q. And did you tell them that you 11 were in the drama club? 12 A. No. I brought nothing about 13 drama club that night, but when I went 14 to Mrs. Lyons at the meeting --- 15 Q. At which meeting? At the drama 16 meeting? 17 A. At the drama meeting my junior 18 year. I had --- I said nothing about 19 drama club at the School Board 20 meeting, and I mentioned that I talked 21 to the School Board about equal 22 recognition and I was wondering if --- 23 if there's somewhere for drama club, 24 we could get some more equal 25 recognition.</p>
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<p>1 A. Yep. 2 ATTORNEY READY: 3 You can ask her. Just 4 slow down a little bit. 5 Okay? 6 THE WITNESS: 7 I'm sorry. I talk fast. 8 ATTORNEY READY: 9 Naturally. 10 BY ATTORNEY O'DONNELL: 11 Q. So something off topic, a 12 School Board meeting that you attended 13 before March 20th of 2019. 14 Is that correct? 15 A. Correct. 16 Q. And you spoke publicly, and 17 asked the School Board if the drama 18 club could be more recognized? 19 A. No. I didn't say drama club 20 specifically. I said --- I went to a 21 School Board meeting, and it just 22 ended by the time I got there. And I 23 talked to several School Board members 24 saying if there's any way we can start 25 an equal recognition by adding, like,</p>	<p>1 And that's when she kind of 2 like blew up in my face. Not in my 3 face, to everyone saying don't ever go 4 over my head again. How 5 unprofessional was that that I did 6 that. But she --- I never intended 7 anything against drama club or talked 8 about drama club. 9 Q. So that I understand what this 10 was about, you on your own, without 11 talking to her first, went to the --- 12 talked to the School Board about equal 13 recognition for the arts. 14 Is that right? 15 A. Correct. 16 Q. And would you agree with me 17 that you didn't know everything that 18 Mrs. Lyons had already discussed with 19 members of the Board regarding 20 recognition of the drama club? 21 A. Correct. 22 Q. And you don't know what 23 conversations she had with Dr. Shank 24 or any members of the Board about 25 recognition of the drama club before</p>

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<p>1 you made that statement to the Board?</p> <p>2 Is that correct?</p> <p>3 A. Right. But I never brought up</p> <p>4 drama club.</p> <p>5 Q. Well Oley Valley School</p> <p>6 District is not that big.</p> <p>7 Right?</p> <p>8 A. Correct.</p> <p>9 Q. And the high school is even --</p> <p>10 has even a smaller population than the</p> <p>11 entire school district.</p> <p>12 Right?</p> <p>13 A. Correct.</p> <p>14 Q. And it would be pretty easy for</p> <p>15 the School Board directors to figure</p> <p>16 out who you were and where you fit</p> <p>17 into the picture of the arts if they</p> <p>18 wanted to.</p> <p>19 Right?</p> <p>20 A. Yes.</p> <p>21 Q. Did it ever occur to you by</p> <p>22 that saying anything, you could be</p> <p>23 doing more harm than good for Mrs.</p> <p>24 Lyons?</p> <p>25 A. No.</p>	<p>1 makes or doesn't make?</p> <p>2 A. No.</p> <p>3 Q. Do you think that she answers</p> <p>4 to you?</p> <p>5 A. I don't know.</p> <p>6 Q. What does that mean, I don't</p> <p>7 know?</p> <p>8 A. I just can't understand her</p> <p>9 sometimes, if she's telling the truth</p> <p>10 or not.</p> <p>11 Q. Does it matter?</p> <p>12 A. To me, it does.</p> <p>13 Q. All right.</p> <p>14 But in -- in the relationship</p> <p>15 between a teacher and a student, a</p> <p>16 play director and an actor, somebody's</p> <p>17 in charge.</p> <p>18 Right?</p> <p>19 A. Correct.</p> <p>20 Q. Is it the actor?</p> <p>21 A. No.</p> <p>22 Q. And you said that pretty</p> <p>23 quickly. You didn't even have to</p> <p>24 think about that.</p> <p>25 A. Correct.</p>
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<p>1 Q. Do you recognize that now?</p> <p>2 A. No.</p> <p>3 Q. Did it ever occur to you that</p> <p>4 Mrs. Lyons would be working on behalf</p> <p>5 of the drama club to get equal</p> <p>6 recognition with other activities in</p> <p>7 the district before you spoke to the</p> <p>8 Board?</p> <p>9 A. No.</p> <p>10 Q. And why not?</p> <p>11 A. I don't know. Because we</p> <p>12 tried, at that meeting, to see if we</p> <p>13 could try to do some kind of like not</p> <p>14 summer activity with some of the</p> <p>15 underclass -- not -- some of the</p> <p>16 middle school, elementary school kids.</p> <p>17 And we tried pushing some idea to do</p> <p>18 more improv and stuff, and she kind of</p> <p>19 turned those ideas down.</p> <p>20 Q. Do you know why? Did she tell</p> <p>21 you why?</p> <p>22 A. No.</p> <p>23 Q. Do you think that she had an</p> <p>24 obligation to share with you every --</p> <p>25 the reasoning for every decision she</p>	<p>1 Q. You're pretty sure that it's</p> <p>2 not the actor in charge.</p> <p>3 Right?</p> <p>4 A. Correct.</p> <p>5 Q. So if -- and -- and you know</p> <p>6 if she gets -- if Mrs. Lyons gets</p> <p>7 paid for what she does?</p> <p>8 A. I believe she does.</p> <p>9 Q. Okay.</p> <p>10 So if she's -- if she's in a</p> <p>11 paid position to direct a play and to</p> <p>12 direct a drama club, and to direct an</p> <p>13 entire department, don't you think</p> <p>14 it's up to her to make decisions like</p> <p>15 that?</p> <p>16 A. Yes.</p> <p>17 Q. And while you may be invited to</p> <p>18 -- to give your input, your input is</p> <p>19 not mandatory for her to make a</p> <p>20 decision.</p> <p>21 Is that true?</p> <p>22 A. That is true.</p> <p>23 Q. Okay.</p> <p>24 So you also mentioned -- okay.</p> <p>25 So the second -- so the second thing</p>

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<p>1 where she called you out, you didn't 2 talk about that yet? 3 A. Yeah. That was --- I don't 4 remember the days. First week of 5 January. It's the first rehearsal for 6 Newsies. And we're --- it's supposed 7 to be a redo. And we all walked in, 8 and she all told us to sit on the 9 floor of the auditorium, and she sat 10 in the director's chair and basically 11 talked at us about things that had 12 happened. Like how you --- trying to 13 remember that night. Like you should 14 be acceptable, and how --- I basically 15 can't remember. I was so frustrated 16 that night. 17 But basically, she was talking 18 to all of us about like few things 19 were said about Jared Mazeika in the 20 lead role, and how people were kind of 21 like bullying him supposedly, but I 22 saw nothing of the sort. And she 23 called me out again that night, 24 telling me like you need to either 25 accept your role or the doors are</p>	<p>1 your sentence. 2 A. I was, like, very upset. And I 3 was very confused about why she called 4 me out. I even raised my hand and 5 asked, like I don't understand. She's 6 like, yes you do and continued 7 speaking to us. 8 Q. So when you say called me out 9 and speaking to us, what did she say 10 directly to you? Did she use your 11 name and --- and speak directly to 12 you? 13 A. Yes. 14 Q. What --- okay. And --- and --- 15 and again, what did she said then, 16 finish the sentence. 17 A. So I'm very --- I'm very 18 disappointed. That's before the thing 19 she said. And she went off a little 20 bit and saying how I should learn to 21 accept other people's roles and if I 22 can't accept anyone else's role or my 23 own role, then the doors are right 24 over there. And then that's when I 25 asked, I'm confused. And then she was</p>
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<p>1 right over there. And you need to 2 learn to accept other people's roles. 3 And I have no idea what she 4 meant about that because I said 5 nothing but nice criticism about why 6 Jordan didn't get the role and Jerry 7 did. I think Jerry Mazeika did really 8 well in dance, and I think he had a 9 voice, but Jordan was a better actor. 10 And I wished there was a way that they 11 could compensate everything. 12 Q. Combine? 13 A. Combine, yeah. To an extent. 14 Like the idea of an understudy show 15 wasn't a great idea. Because that's 16 what we did for previously in the fall 17 play so I was assuming like, you know, 18 get some seniors to be able to play 19 some lead roles for a show and let 20 them, like, experience, like, the 21 stage for a --- like the spotlight for 22 a little bit. 23 But basically, when she called 24 me out, I was ---. 25 Q. Go ahead. I was what? Finish</p>	<p>1 like, no you're not. And then 2 continued talking about something else 3 with everyone against --- well, at 4 everyone else. 5 Q. Was telling you that you need 6 to accept the fact that someone else 7 got a role even though you didn't 8 disagree with it, illegal? 9 A. No. The reason why I was --- 10 spoke at the School Board meeting 11 because I was publicly humiliated 12 twice by Mrs. Lyons and I was sick of 13 being called out and watching others, 14 people, be called out by her. And I 15 really went to the School Board to 16 talk about that and how unprofessional 17 it is for us teenagers. 18 Because if you want --- if you 19 have a problem or something going on, 20 come talk to us individually. Not 21 shouting in front of a room full of 22 people. It's not only humiliating and 23 embarrassing, but word gets around a 24 small school. And people take things 25 and change it up, what was actually</p>

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<p>1 said then people don't know the full</p> <p>2 truth.</p> <p>3 So that's why I went to that</p> <p>4 School Board meeting. Because I want</p> <p>5 her to stop that.</p> <p>6 Q. Tell me about --- tell me about</p> <p>7 the situation where she said I'm ---</p> <p>8 sitting in front of all people, I'll</p> <p>9 never forgive you?</p> <p>10 A. Uh-huh (yes).</p> <p>11 Q. Okay.</p> <p>12 Tell me about that.</p> <p>13 A. So there's these things we call</p> <p>14 happy papers, and ---.</p> <p>15 Q. Happy papers?</p> <p>16 A. Yes. And that's where you</p> <p>17 write like a nice sentence or two</p> <p>18 about everyone on the cast, which</p> <p>19 everyone did and everyone does. And</p> <p>20 then at the end of every show, at the</p> <p>21 cast and crew party, the last couple</p> <p>22 years she takes everyone's happy paper</p> <p>23 and says something nice about each</p> <p>24 person. They go on stage, and then</p> <p>25 she acknowledges them like big</p>	<p>1 And then ---.</p> <p>2 A. There was nothing --- I feel</p> <p>3 like nothing, like out there was</p> <p>4 positive. It was more like neutral.</p> <p>5 Q. Okay.</p> <p>6 Neutral. And then --- then</p> <p>7 there was something that ---?</p> <p>8 A. And then she's like, I'll never</p> <p>9 forgive you for what you said, but may</p> <p>10 this be a life lesson to you. And she</p> <p>11 handed my --- we have like a bag of</p> <p>12 goodies that people give to us for</p> <p>13 like candy grams. And then she gave</p> <p>14 us that, and gave her --- gave me</p> <p>15 that, and then I walked off stage.</p> <p>16 And I was the only person that night</p> <p>17 did not --- didn't --- not that I</p> <p>18 wanted one, but received a hug.</p> <p>19 Q. Received a hug. You did not</p> <p>20 get a hug?</p> <p>21 A. I did not.</p> <p>22 Q. Okay.</p> <p>23 And then, is there anything</p> <p>24 illegal about that?</p> <p>25 A. No.</p>
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<p>1 performance, and this person is blah,</p> <p>2 blah, blah.</p> <p>3 When she got to me, it was ---</p> <p>4 she was like so this person here, we</p> <p>5 almost lost this person this year. And</p> <p>6 then she said some little positive</p> <p>7 things like he's an act --- he's been</p> <p>8 an active member for four years, and</p> <p>9 yada, yada, yada. And then, the last</p> <p>10 thing she said ---.</p> <p>11 Q. Well I don't want to hear yada,</p> <p>12 yada, yada.</p> <p>13 A. I can't recall what she said</p> <p>14 because I was ---.</p> <p>15 Q. So you don't remember the good</p> <p>16 stuff or the neutral stuff?</p> <p>17 A. Yeah, I was highly annoyed</p> <p>18 because of things that were said</p> <p>19 throughout the night between Jerry</p> <p>20 Mazeika and a few other people.</p> <p>21 Q. But she did say some either</p> <p>22 good things or neutral things that you</p> <p>23 call yada, yada, yada?</p> <p>24 A. I call neutral.</p> <p>25 Q. Okay.</p>	<p>1 Q. Okay.</p> <p>2 Then you did mention the email</p> <p>3 about Jordan who was never named in</p> <p>4 the email, but we talked about that</p> <p>5 already?</p> <p>6 A. Yes.</p> <p>7 Q. And then, the --- then I ---</p> <p>8 the next thing I wrote was auditorium</p> <p>9 lobby, leave school premises. But</p> <p>10 there might've something in between</p> <p>11 Jordan's email and the auditorium</p> <p>12 lobby that you mentioned that I just</p> <p>13 missed.</p> <p>14 A. Yeah. That was the cast and</p> <p>15 crew party I was just talking about.</p> <p>16 The one where she said I'll never</p> <p>17 forgive you for what you did.</p> <p>18 Q. Okay.</p> <p>19 And then, the next thing would</p> <p>20 be the auditorium lobby?</p> <p>21 A. Correct.</p> <p>22 Q. Okay.</p> <p>23 And then, what was that about?</p> <p>24 A. So --- so we have a mandatory</p> <p>25 set strike every year. It's --- it's</p>

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<p>1 mandatory. And so we ---.</p> <p>2 Q. Mandatory?</p> <p>3 A. It's --- means we all have to</p> <p>4 --- everyone on the cast and crew and</p> <p>5 has to show up and help take down the</p> <p>6 set. Basically, put away the props</p> <p>7 and then vice versa --- yeah.</p> <p>8 Q. Break --- break it down?</p> <p>9 A. Yeah.</p> <p>10 Q. What's --- what's the</p> <p>11 terminology for that?</p> <p>12 A. Set strikes.</p> <p>13 Q. Set strikes?</p> <p>14 A. Set strike.</p> <p>15 Q. Okay.</p> <p>16 So a mandatory set strike. So</p> <p>17 everybody shows up, and what happens?</p> <p>18 A. We sit down in the auditorium,</p> <p>19 and then either we have like a recap</p> <p>20 or then we start like, okay. Here's</p> <p>21 the job, this is what we have to do</p> <p>22 today. We need these props to go back</p> <p>23 in the prop room. We need some people</p> <p>24 to start taking down the stage, and</p> <p>25 kind of like, we have jobs.</p>	<p>1 Okay.</p> <p>2 BY ATTORNEY O'DONNELL:</p> <p>3 Q. Okay.</p> <p>4 So the last thing I remember</p> <p>5 you saying before we took a break was</p> <p>6 that you were to sit in your seat</p> <p>7 until another job came along until the</p> <p>8 auditorium was completely finished,</p> <p>9 and looked like it did three months</p> <p>10 before the play started?</p> <p>11 A. Pretty much, yes.</p> <p>12 Q. Is that correct?</p> <p>13 All right.</p> <p>14 So --- so you were in the</p> <p>15 auditorium lobby. You had finished</p> <p>16 with your set strike?</p> <p>17 A. No. I arrived --- it started</p> <p>18 at 10:00. I arrived there with four</p> <p>19 other people at 10:10, and I was only</p> <p>20 there for anywhere between ten and ---</p> <p>21 ten and 15 minutes. I was waiting in</p> <p>22 the auditorium itself, waiting for a</p> <p>23 job. And while waiting --- actually,</p> <p>24 I lied. Sorry.</p> <p>25 First, I had to go back and</p>
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<p>1 And then, when you're done with</p> <p>2 your job, you go back, sit --- sit ---</p> <p>3 pretty much sit in your seat until</p> <p>4 someone says hey, we need --- we need</p> <p>5 help here or there's a job that needs</p> <p>6 to be done. And we cycle that for a</p> <p>7 few hours until the auditorium is</p> <p>8 cleaned and kind of how it was three</p> <p>9 months before building the stage.</p> <p>10 ATTORNEY O'DONNELL:</p> <p>11 Come in.</p> <p>12 ATTORNEY READY:</p> <p>13 Angela Zola?</p> <p>14 ATTORNEY O'DONNELL:</p> <p>15 Yes. Thank you. I have</p> <p>16 to --- I have to take this.</p> <p>17 ATTORNEY READY:</p> <p>18 Yeah, sure. It's all</p> <p>19 right. We'll --- we'll go off</p> <p>20 the record.</p> <p>21 ---</p> <p>22 (WHEREUPON, AN OFF RECORD DISCUSSION</p> <p>23 WAS HELD.)</p> <p>24 ---</p> <p>25 ATTORNEY O'DONNELL:</p>	<p>1 clean up the --- our changing room.</p> <p>2 Q. Okay.</p> <p>3 A. So like, clean the desks, clean</p> <p>4 the floor. Make sure everything's</p> <p>5 like neat and tidy for --- for music</p> <p>6 classroom. And then after that, I was</p> <p>7 done with that part. I got my costume</p> <p>8 all hanged up, I hanged it up. I went</p> <p>9 back to the auditorium. This time was</p> <p>10 around 10:20, 10:25 give or take. And</p> <p>11 I was waiting for another job. And</p> <p>12 Mrs. Lyons comes --- comes out of the</p> <p>13 side doors and says, can you follow me</p> <p>14 for a second? So I'm like, okay.</p> <p>15 So it was her and Abby</p> <p>16 Hartenstine and three guys in the back</p> <p>17 following her. So I assumed like, we</p> <p>18 need help. So I followed her to the</p> <p>19 auditorium lobby. And then, the three</p> <p>20 men who were kind of like in a</p> <p>21 triangle, Mrs. Lyons basically in the</p> <p>22 middle. And basically said, I had ---</p> <p>23 I talked to Dr. Shank, and we both ---</p> <p>24 this is paraphrased. We both agree</p> <p>25 that it's better --- it's that if you</p>

12 (Pages 42 to 45)

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<p>1 leave the premises because of things 2 that were said last night. 3 Q. Okay. 4 And asking you to leave the 5 premises, was that illegal? 6 A. I don't know. 7 Q. Why --- what --- what's wrong 8 with it? 9 A. Because I couldn't --- I had no 10 idea for why I had to leave the 11 premises. 12 Q. But --- 13 A. Like, I don't know what I said 14 that was so harmful and dangerous that 15 said it could've hurt the safety of 16 other students. 17 Q. The night before? 18 A. I have no idea. I had no idea 19 what she meant by that. 20 Q. Okay. 21 A. I'm pretty sure when she said 22 things last night, I'm assuming it's 23 something that I said that night, 24 morning I should say. 25 Q. Okay.</p>	<p>1 A. No. 2 Q. Are they --- right. They're 3 --- they're --- they are not, would 4 you agree with me --- 5 A. Yeah. 6 Q. --- obligated or mandated to 7 report to you, in any fashion, the 8 basis for any decision they make with 9 respect to the school. 10 Right? 11 Is that correct? 12 A. Correct. 13 Q. All right. Okay. 14 So when she makes mention of 15 because of the things that were said 16 last night, tell me what those things 17 were. 18 A. So we had senior speeches. And 19 I was one of the first few kids to go, 20 I wasn't the first one. But I made 21 mine short and sweet. Like, first we 22 state where we're going to college and 23 what we're planning to do with our 24 lives. And then you need to say 25 something inspirational. So I went</p>
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<p>1 But the very act itself of 2 calling a student in to do some work 3 in a school building, and then --- and 4 then --- and then recalling, or --- or 5 exiting that student from the 6 building, for whatever reason, that in 7 and of itself is something that you 8 don't know is legal? 9 A. No. It's not illegal. 10 Q. Okay. 11 You just disagree with the 12 reason why you were exited from the 13 building. 14 Right? 15 A. Correct. 16 Q. Okay. 17 And does Mrs. Lyons or Dr. 18 Shank have any obligation to report to 19 you the basis for their decision to 20 exit you from a building for one 21 reason or another? 22 A. Nope. I got nothing of --- any 23 information about it. 24 Q. But do they have an obligation 25 to give it to you?</p>	<p>1 --- I was one of the first ones to go. 2 And I said that family is not a 3 place, it's the people you surround 4 yourself with. 5 And that's basically the 6 synopsis of all I said. I wasn't 7 adding that somebody --- there was no 8 intentions of like --- like any forms 9 of like at Mrs. Lyons or at Shank or 10 at Jerry Mazeika or anybody. It was 11 basically just what I thought family 12 meant to me. At least, that's what my 13 speech wanted to be. Because people 14 always talked about drama club being 15 like the home, but it's really the 16 people that make the home. And that's 17 basically what my speech was about. 18 Q. Okay. 19 Did you say anything 20 specifically negative about Mrs. 21 Lyons? 22 A. No. 23 Q. Did you say anything 24 specifically negative about your 25 experience in drama club?</p>

13 (Pages 46 to 49)

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<p>1 A. No. Not until after, like 2 after everything happened. 3 Q. Not until --? 4 A. Not until after -- after like, 5 I was escorted and people were looking 6 me as if I was some kind of, I don't 7 -- evil person. 8 Q. Okay. 9 But during your senior speech, 10 11 A. Yes. 12 Q. -- it's your testimony that 13 you said nothing directly or 14 indirectly about your experience in 15 the drama club -- 16 A. Correct. 17 Q. -- that was negative? 18 A. Correct. 19 Q. Okay. 20 I understand that you don't 21 think anyone should've taken issue 22 with what you said, but if they could, 23 can you put yourself in their shoes? 24 What could possibly be construed in a 25 negative fashion? If you had to</p>	<p>1 of her stuff -- some of her stuff out 2 of my car. 3 Q. Who's your girlfriend? 4 A. Cassidy Kauffman. 5 Q. Okay. 6 So you and Cassidy were walking 7 out together? 8 A. Yes. 9 Q. When did -- when was Cassidy 10 with you? In other words --. 11 A. Sorry. 12 Q. How did she come into this? 13 A. So the Lyons told me that I had 14 to -- the -- left -- leave the 15 premises. I asked, there are a few 16 people that need to get their stuff 17 out of my car. Can you go get them? 18 So Mrs. Hartenstine went to go get 19 them, and I waited in the lobby for 20 the three of them to come out and get 21 their stuff. And then that's when I 22 walked out of the building. 23 Q. Okay. 24 And Cassidy was with you at 25 that time?</p>
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<p>1 guess. 2 A. I -- I really have no idea. 3 Q. Do -- okay. 4 Do you know if your other 5 friends, or your co-Plaintiffs, have 6 said anything negative about the drama 7 club in senior speeches? 8 A. Yes. 9 Q. Okay. 10 A. On that -- I withdraw. No, 11 I'm sorry. No. 12 Q. So you're being escorted out by 13 these three men. Who were the men? 14 A. Mr. Lyons, who was Mrs. Lyons' 15 husband. Mr. Ulsh who is a father of 16 a student, Julia Ulsh. And then, Mr. 17 Stout who is another -- a father of 18 another student who were all helping 19 out with the show. 20 Q. Okay. 21 Did any of those gentlemen 22 speak to you while they were escorting 23 you out? 24 A. When I -- I walked out with my 25 girlfriend because she had to get some</p>	<p>1 A. Yes. 2 Q. Okay. 3 So Cassidy was with you, and 4 then Mr. Lyons, Mr. Ulsh, and Mr. 5 Stout? 6 A. Uh-huh (yes). 7 Q. Yes? 8 A. Yes. 9 Q. And did any -- did either Mr. 10 Lyons, Mr. Ulsh, or Mr. Stout speak to 11 you? 12 A. Mr. Lyons spoke to my 13 girlfriend and I because I was on the 14 pavement by my car, like emotionally 15 broken. And she was trying to call my 16 mom to see if she might have to pick 17 me up because I didn't want to drive 18 home emotional because that could be 19 dangerous. 20 And then Mr. Lyons spoke at my 21 girlfriend, basically to say are you 22 coming or are you staying? And then 23 she replied hold on a minute, I'm 24 trying to call his mom. 25 Q. Okay.</p>

14 (Pages 50 to 53)

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<p>1 Do you --- did you have an IEP 2 for emotional support? 3 A. I got an IEP I believe after 4 the School Board meeting. 5 Q. And was it for emotional 6 disturbance? 7 A. I don't remember, but I know 8 I've never gotten an IEP before. 9 Q. Because you already --- you 10 mentioned twice during your 11 deposition, emotionally unstable and 12 emotionally broken. So I'm asking 13 this, have you ---? 14 A. I've never, ever --- sorry. 15 Q. No. 16 A. Okay. 17 Q. Let me just --- you'll be able 18 to speak. 19 A. Sorry. 20 Q. Just let me get my question 21 out. I --- so --- so have you treated 22 at all for emotional disturbances? 23 A. No. Because I have never, ever 24 --- I have never been that emotional 25 for --- I've never had, like, a mental</p>	<p>1 that was reason for me to be escorted 2 off the premises. I --- I --- I 3 didn't ask, which is partially my 4 fault, but she should've implied what 5 I said or more of a reason why I had 6 to leave. 7 Q. Do you think you were guilty by 8 association in her mind? 9 A. Can you repeat that? Sorry. 10 Q. Sure. Do you think you were 11 guilty by association in her mind? 12 A. No. 13 Q. Why do you think she had you 14 escorted off the premises? 15 A. I --- honestly, I have no idea. 16 Q. Were you suspended with the 17 other two? 18 A. No. But I'd just like to add 19 how all three of us got punished or 20 reprimanded for something. And we 21 were the three kids that spoke out at 22 the School Board meeting. 23 Q. How were you --- you --- you 24 were --- you feel you were punished 25 because you were called out, you were</p>
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<p>1 breakdown or any kind of emotional 2 means, except for like those three or 3 four experiences I had within the span 4 of like the three week --- the three, 5 four weeks of everything that happened 6 between the School Board meeting and 7 then me being escorted out. And it's 8 not happened since then either. 9 Q. Okay. 10 Remind me again, what did Mr. 11 Lyons say to Cassidy? 12 A. Are you coming or are you 13 staying? I mean, are you going or are 14 you staying? My bad. 15 Q. But that was the only 16 conversation between any of those 17 three and you and Cassidy --- 18 A. Correct. 19 Q. --- as they walked you out? 20 Okay. Okay. 21 And then --- and then the last 22 thing, when you say no proof of what I 23 said. Does that ---? 24 A. Like, she didn't give me --- I 25 had no idea what I said that night</p>	<p>1 removed from the premises, and she 2 didn't have anything nice to say about 3 you and didn't give you a hug at happy 4 papers? 5 A. Yes. 6 Q. So, I may have a couple of 7 other things that I want to follow up 8 on. 9 A. Yeah. 10 Q. What exactly did you say at the 11 School Board meeting? 12 A. So I had a speech written out, 13 So I followed the first about three, 14 four sentences. When I --- it started 15 out me stating how I was called out by 16 Mrs. Lyons the first time and the 17 second time. And then, I was stopped 18 by the Chairman of the School Board 19 saying I was not allowed to use any 20 character assassinations or names 21 involving any negativity. 22 So by that point, I kind of 23 went off my speech and talked about 24 what happened that day with me and how 25 I went to a minute --- went --- about</p>

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<p>1 the defamation email and how 2 administration wasn't there, guidance 3 couldn't help me or do anything, and 4 teachers had to teach so I couldn't go 5 anywhere for any, like, emotional 6 support. So basically, the synopsis 7 that I was trying to get out at the 8 School Board is like, if somebody 9 needs help, like in other situations 10 in that school, there --- and there's 11 nobody there, what are they going to 12 do? 13 Because I feel bad for guidance 14 because guidance teachers there are to 15 help, support, and guide like, 16 students. But they can't do that 17 because they're stuck in meetings 18 24/7. I don't know if it's like how 19 the school works, or their actual job, 20 but I know that some --- a lot of them 21 are kind of like, unhappy with how 22 many meetings they have to go through. 23 And how they can't be able to help 24 students when they need it. 25 Q. Is that everything?</p>	<p>1 and unsecure of going to school 2 because I was --- because of things 3 that happened that night and how I was 4 escorted. And I was never brought --- 5 and that situation was never brought 6 up either. So both reports I wrote to 7 the school, they didn't contact me and 8 didn't tell me nothing about them. 9 Q. Okay. 10 A. Even though I felt like --- I 11 said I was threatened. 12 Q. By whom? 13 A. By Mrs. Lyons. And several 14 students. 15 Q. And who were the other 16 students? 17 A. Jerry Mazeika. 18 Q. Who else? 19 A. And I --- I don't --- can't 20 specify --- I don't know. Like, a 21 bunch of people, like in the club, 22 that are like supportive of Mrs. 23 Lyons. And that --- those could be 24 assumptions too. 25 Q. So a bunch of people that</p>
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<p>1 A. Yes. 2 Q. Who is the Chairman who told 3 you that you couldn't make any 4 negative remarks of character 5 assassinations against any specific 6 persons in your speech? 7 A. I don't know his name. 8 Q. Was there anyone else on the 9 Board that also spoke up? 10 A. No. 11 Q. Just the chairman? 12 A. Correct. 13 Q. And with respect to the 14 defamation email, your complaint was 15 that there was no one to speak to 16 about it? 17 A. Yes. 18 Q. Did Mr. Becker ever respond to 19 your complaint that you left in his 20 office? 21 A. No. But I also want to add, I 22 also wrote another complaint on the 23 --- that Monday after set strike about 24 me being escorted. And I --- I have a 25 photo of it of me feeling threatened</p>	<p>1 support Mrs. Lyons threatened you? 2 A. No. They didn't --- no, they 3 didn't threaten me, no. Sorry. Like 4 I said, I felt threatened when I was 5 escorted. I am sorry. 6 Q. Okay. 7 I wanted to know who made you 8 feel threatened. That was my 9 question. 10 A. Mrs. Lyons. 11 Q. Yes. 12 A. Jerry Mazeika. 13 Q. Yes. 14 A. And then the three ---. 15 Q. Three fathers? 16 A. Yeah. 17 Q. And what kind of threat was it? 18 A physical threat? 19 A. It's more --- I felt physical 20 from probably Mrs. Lyons and Jerry 21 Mazeika. 22 Q. And what kind of physical 23 threat do you feel like they opposed 24 to you? 25 A. Physical? I mean, like more</p>

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<p>1 like verbal. Sorry.</p> <p>2 Q. Okay.</p> <p>3 What did they say to you</p> <p>4 verbally that made you feel</p> <p>5 threatened?</p> <p>6 A. Because it --- I heard people</p> <p>7 talking about me, talking about like</p> <p>8 what happened.</p> <p>9 Q. Okay.</p> <p>10 But --- but a verbal threat is</p> <p>11 something that happens directly to</p> <p>12 you. So what did they say?</p> <p>13 A. They didn't say anything.</p> <p>14 Q. All right.</p> <p>15 No physical, no verbal. What</p> <p>16 I'm hearing is, people were talking</p> <p>17 about you?</p> <p>18 A. Uh-huh (yes).</p> <p>19 Q. Yes?</p> <p>20 A. Yes.</p> <p>21 Q. And what did that threaten?</p> <p>22 What part of you did that threaten?</p> <p>23 A. My emotional being. And also,</p> <p>24 I --- my security of being around</p> <p>25 other people.</p>	<p>1 And where did you eat lunch</p> <p>2 then with him?</p> <p>3 A. In his digital electronics</p> <p>4 classroom. And also his --- his ---</p> <p>5 his normal classroom. Because we have</p> <p>6 like --- we have rotation schedules</p> <p>7 and my lunch differed on certain days.</p> <p>8 So whenever he had classes, it'd</p> <p>9 differed. It --- it differed.</p> <p>10 Q. Okay.</p> <p>11 A. Sorry.</p> <p>12 Q. No problem. And you would ---</p> <p>13 you would go to the cafeteria and</p> <p>14 bring your tray?</p> <p>15 A. I packed.</p> <p>16 Q. Packed your lunch?</p> <p>17 A. Yeah. Safer that way.</p> <p>18 Q. What does that mean, safer? Do</p> <p>19 you --- do you know ---?</p> <p>20 A. I don't know, it's --- sorry.</p> <p>21 That was bad humor.</p> <p>22 Q. Okay.</p> <p>23 A. Sorry.</p> <p>24 Q. Okay</p> <p>25 So one of the other things that</p>
Page 63	Page 65
<p>1 Q. Did you --- were you able to</p> <p>2 get over that, and come back to school</p> <p>3 and finish out the school year?</p> <p>4 A. Yeah.</p> <p>5 Q. Okay.</p> <p>6 A. It took time. I had to --- my</p> <p>7 track coach --- my track coaches were</p> <p>8 the only two teachers I was able to</p> <p>9 like, if I ever need to like, get away</p> <p>10 from places --- like they were the</p> <p>11 people that say you should come to my</p> <p>12 room and sit. So that --- the whole</p> <p>13 week, I ate lunch with my teacher Mr.</p> <p>14 Shaffer because I emotionally felt</p> <p>15 unsafe in that school.</p> <p>16 Q. And who is Mister --- you said</p> <p>17 your teacher ---</p> <p>18 A. Yeah.</p> <p>19 Q. --- Mr. Shaffer?</p> <p>20 A. Correct.</p> <p>21 Q. Which teacher?</p> <p>22 A. Mr. Shaffer?</p> <p>23 Q. Yeah.</p> <p>24 A. He's mathematics.</p> <p>25 Q. Okay.</p>	<p>1 you have in your Answers to</p> <p>2 Interrogatories that your attorney</p> <p>3 provided to us was you --- you know</p> <p>4 you have knowledge of rumors that were</p> <p>5 spread about you as a result of the</p> <p>6 suspension. But you were not</p> <p>7 suspended.</p> <p>8 Right?</p> <p>9 A. Correct.</p> <p>10 Q. Were there rumors spread about</p> <p>11 you anyway?</p> <p>12 A. Yes.</p> <p>13 Q. Okay.</p> <p>14 By whom?</p> <p>15 A. I can't --- I don't know who or</p> <p>16 where the source came from.</p> <p>17 Q. What were the rumors?</p> <p>18 A. Stated how I, even until the</p> <p>19 end of the show, I couldn't accept my</p> <p>20 role and I never showed up to the</p> <p>21 cleanup. Or I ditched.</p> <p>22 Q. What role did you have?</p> <p>23 A. I was Crutchie.</p> <p>24 Q. Okay.</p> <p>25 And did you --- were you okay</p>

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<p>1 with that role?</p> <p>2 A. I --- that's --- that was one</p> <p>3 of my dream roles since I was like,</p> <p>4 11.</p> <p>5 Q. Okay.</p> <p>6 So you were happy with your</p> <p>7 role?</p> <p>8 A. I was happy with my role.</p> <p>9 Q. Okay.</p> <p>10 Were you happy with the role</p> <p>11 that Jerry got?</p> <p>12 A. No.</p> <p>13 Q. And were you happy with the</p> <p>14 role that Jordan got?</p> <p>15 A. Yes and no.</p> <p>16 Q. Okay.</p> <p>17 And then --- okay. Okay.</p> <p>18 So then --- then there's</p> <p>19 something else on here that you</p> <p>20 answered I have a question about. I</p> <p>21 asked you, in Question 17, the</p> <p>22 question is set forth in detail and</p> <p>23 specificity each and every act or</p> <p>24 omission committed by Stacey Lyons</p> <p>25 during the production of Newsies that</p>	<p>1 you expound on that?</p> <p>2 A. That's --- that was when she</p> <p>3 called me at the first --- so the both</p> <p>4 times when she called me out.</p> <p>5 Q. Okay.</p> <p>6 And then the next, you said she</p> <p>7 played favorites in making decisions</p> <p>8 and in dealing with discipline or</p> <p>9 disagreements on set.</p> <p>10 A. Yes.</p> <p>11 Q. Were you -- can you expound on</p> <p>12 that?</p> <p>13 A. This is not drama club related.</p> <p>14 During the mosaic concert which is</p> <p>15 like --- we have a few concerts for</p> <p>16 band, orchestra, and choir of the</p> <p>17 year. And we do this mosaic concert.</p> <p>18 Q. Mosaya (sic)?</p> <p>19 A. Mosaic.</p> <p>20 Q. Mosaic?</p> <p>21 A. Mosaic, yeah. And so the music</p> <p>22 production team is in charge of that.</p> <p>23 So that was run by Mrs. Lynch, our</p> <p>24 choral and orchestra director. And</p> <p>25 during our, like our dress rehearsals,</p>
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<p>1 caused you to speak out against her at</p> <p>2 the --- at the Board meeting. And you</p> <p>3 have a list here. So I want to ask</p> <p>4 you about these, the list.</p> <p>5 You said Mrs. Lyons was mean to</p> <p>6 students who made mistakes while</p> <p>7 performing. Can you expound on that,</p> <p>8 please?</p> <p>9 A. Basically like, during the read</p> <p>10 through --- not read through. During</p> <p>11 one of the rehearsals, she told Jordan</p> <p>12 that he didn't put enough energy to</p> <p>13 his role.</p> <p>14 Q. Okay.</p> <p>15 A. I can't really give a lot of</p> <p>16 examples. There was --- there was a</p> <p>17 view that I witnessed.</p> <p>18 Q. You just can't remember them as</p> <p>19 you sit here today?</p> <p>20 A. Yeah.</p> <p>21 Q. You --- the next thing you</p> <p>22 state is Mrs. Lyons called me out</p> <p>23 among other students for mistakes or</p> <p>24 perceives mistakes and then berate us</p> <p>25 in front of the cast and crew. Can</p>	<p>1 Mrs. Lyons had to come and set up the</p> <p>2 mic set because she's, apparently, the</p> <p>3 only one that knows how to use them.</p> <p>4 But they're the auditorium's mics.</p> <p>5 Yet, she hoards them in her office.</p> <p>6 And then, whenever we need to use them</p> <p>7 as, like, a music production, she has</p> <p>8 to be there to make sure they're done</p> <p>9 properly.</p> <p>10 Q. She hoards the mics?</p> <p>11 A. Yes.</p> <p>12 Q. Is there something illegal</p> <p>13 about that?</p> <p>14 A. No.</p> <p>15 Q. Okay.</p> <p>16 Anything else where you feel</p> <p>17 that she plays favorites?</p> <p>18 A. No.</p> <p>19 Q. Okay.</p> <p>20 D, you --- you say that she</p> <p>21 scheduled excessive call backs after</p> <p>22 auditions, creating an atmosphere of</p> <p>23 stress, culminating with posting the</p> <p>24 cast lists near midnight so that</p> <p>25 students were waiting on a school</p>

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<p>1 night for results. 2 A. Yes. 3 Q. Okay. 4 Can you expound on that? 5 A. It was 1:00 --- let's see, 6 January 2nd I believe. And I was 7 facetimeing my friend Grace, waiting 8 for like the cast list to come out. 9 It came out like 1:00, 1:30 at --- in 10 the morning. So yeah, and call backs 11 were really excessive this year. We 12 had --- there were four call backs. 13 We had normal, regular call 14 backs, and then there was like in 15 excess part for the Katherine's and 16 the Jack Kelly's so that was between 17 three girls and two guys. And then 18 the 4th call back, which was I believe 19 was after Christmas was between two 20 guys and two girls for the main leads. 21 Q. Is there anything --- is there 22 anything illegal about that? 23 A. No. 24 Q. Okay. 25 The next --- she was almost</p>	<p>1 shows up half an hour early (sic), and 2 then she takes her time and we all 3 start another 15 minutes after that. 4 So here we are, a half hour, 45 5 minutes later for her getting ready 6 and getting setup. 7 And then, sometimes rehearsals, 8 like when we need to get stuff done, 9 we will go over the time. Because I 10 remember one rehearsal my sophomore 11 year, I was --- my mom was waiting in 12 the parking lot for almost an hour 13 because rehearsal went over a little 14 --- over --- over board --- 15 Q. Okay. 16 A. --- as we're cramming certain 17 things. 18 Q. All right. 19 So that's that? 20 A. Yeah. 21 Q. All right. 22 And then --- I'm sorry. 23 A. You can't ---. 24 Q. The next is, she sent a 25 defamatory email about Jordan claiming</p>
Page 71	Page 73
<p>1 always late in starting rehearsals, 2 and rehearsals almost always ended 3 late. Do you want to expound on that? 4 A. I have a question. Did I --- 5 is this my actual my thing? My ---? 6 Q. Yes. 7 A. Okay. 8 Q. When you say this is my actual 9 thing ---? 10 A. I'm just --- I'm just trying to 11 remember, like, what I wrote. 12 Q. Okay. 13 A. I'm just trying to remember. 14 I'm just making sure I wasn't, like, 15 mixed up. Yeah, sorry. I had a 16 thing. 17 Can you repeat the question? 18 Q. Sure. It states she was almost 19 always late in starting rehearsals, 20 and rehearsals almost always ended 21 late. Do you have a ---? 22 A. Yes. 23 Q. Okay. 24 A. I understand that she has a 25 job, but also it sucks that we --- she</p>	<p>1 the police had to be called on him. 2 This fabrication was hurtful to me as 3 his friend. Anything beyond hurtful 4 to you? 5 A. No. 6 Q. Okay. 7 And then, she was angry and 8 irritable with the students who 9 weren't her favorites. 10 A. Yes. 11 Q. Can you expand on that? 12 A. I can definitely tell some of 13 the things how she was acting at 14 Jordan during the show, and how like 15 --- kind of like --- because normally 16 she got --- she got --- there's 17 different people. Like, when she 18 called out on certain people, you can 19 definitely tell that she called out on 20 them. And you definitely could tell 21 like who she wanted to pick to do 22 certain things. 23 Q. Okay. 24 The next thing I asked you is 25 to detail everything you had hoped to</p>

19 (Pages 70 to 73)

Page 74	Page 76
<p>1 achieve or gain by speaking out 2 against Mrs. Lyons at the public 3 School Board meeting. 4 A. Yes. 5 Q. And you listed four things. 6 A. Yes. 7 Q. Number 1 is I hoped for an 8 apology for public --- publicly 9 accusing me of --- well, here's what 10 you wrote. And then, you can maybe 11 rephrase it for me. 12 A. Okay. 13 Q. That --- that is more 14 grammatically correct, but I'm ---, 15 A. Sorry. 16 Q. That's okay. I'm just going to 17 read it to you, and then you correct 18 it and tell me what you mean. I hoped 19 for an apology for publicly accusing 20 me of accusation which were not true 21 and not investigated in front of the 22 entire club twice. 23 A. So when she called me out 24 twice. 25 Q. That was the ---</p>	<p>1 Q. And then you say you had also 2 hoped that Mrs. Lyons would be closely 3 watched by the school. What did you 4 mean? 5 A. I was hoping for like either 6 parents or school members to come see 7 and watch her. Like, kind of --- I 8 don't know. Make sure that she 9 behaves, make sure that she doesn't do 10 that to kids again. Like, publicly 11 humiliate them or anything else that 12 she does. 13 Q. So not just watch, but --- but 14 corrected? 15 A. Yes. 16 Q. And then you write, Mrs. Lyons 17 would be removed and the music 18 department would finish the remainder 19 of the show? 20 A. Yeah. That was like, the 21 ultimate scenario. If like, nothing 22 was going to go --- like, they --- 23 nothing's going to go right. Because 24 the music department was ready to step 25 in, in case anything happens.</p>
Page 75	Page 77
<p>1 A. Yeah. 2 Q. --- two call outs? You wanted 3 an apology for the call outs? 4 A. Correct. 5 Q. Okay. 6 And then, the next thing is 7 Mrs. Lyons would be given special 8 training to deal with students. What 9 kind of special training did you have 10 in mind for her? 11 A. More like just to stop like, 12 the barbaric ways. How she calls 13 people out and ---. 14 Q. Barbaric ways? 15 A. Yeah. How she calls people 16 out, and doesn't investigate things. 17 And she only has her --- her little 18 few people that she listens to or when 19 someone says hey, this person is being 20 this. She automatically reacts that 21 you did this wrong without fully 22 investigating. Or asking the other 23 party what is actually going on. She 24 always has just the one side of the 25 story instead of both sides.</p>	<p>1 Q. How did the music department 2 know all about this? 3 A. I don't know. 4 Q. Did you tell somebody? 5 A. No. 6 Q. You didn't say anything about 7 Mrs. Lyons to somebody in the music 8 department? 9 A. Only Mrs. Lynch. 10 Q. You talked to Mrs. Lynch, her 11 colleague? 12 A. She's the orchestra band 13 director. 14 Q. Do you know if Mrs. Lyons knows 15 Mrs. Lynch? 16 A. Yeah. She --- she --- she does 17 the voice, sorry. She does the vocal 18 rehearsals and she ran it this year. 19 And she had a few problems with Mrs. 20 Lyons. 21 Q. What kind of problems did she 22 have? 23 A. During the mosaic concert, like 24 the mic set --- the mic part. And 25 also, Lyons criticized some of the</p>

20 (Pages 74 to 77)

Page 78	Page 80
<p>1 light choices that were being used. 2 Q. Light choices? 3 A. Uh-huh (yes). 4 Q. During the mosaic concert? 5 A. Yeah. 6 Q. Anything else that Mrs. Lyons 7 did? 8 A. And the unnecessary call backs, 9 and like how it was cut into a 10 Christmas break. 11 Q. During Christmas break? 12 A. Yeah. With the excessive 13 amount of call backs. 14 Q. Was that something that Mrs. 15 Lynch complained about? 16 A. Yeah. Because she had to be 17 there to do the voice stuff and piano. 18 Those cut into her ---. 19 Q. Okay. 20 Then I talked to you about your 21 damages. And you said you missed half 22 a day of school because you needed 23 help, but no one in the school was 24 willing to help. That was when you 25 were running around with the email?</p>	<p>1 And that she hopes that Jordan and 2 Haley would quit the show. And that 3 was like an hour before the meeting 4 with Becker and Shank. And before I 5 found out that Jordan got suspended. 6 And her dad was one of the dad's that 7 escorted me. 8 Q. I thought -- I recognized the 9 name, Ulsh. 10 A. Sorry. 11 Q. Okay 12 Then anybody besides Julia 13 expressing her opinion about ---? 14 A. There was a few other people 15 saying like why'd you do it? Or like, 16 are you there --- are you here like -- 17 - and I'm just like, I'm just here to 18 support to my friend. And I see 19 things that Lyons has done that's hurt 20 me too and hurting other people, and I 21 want it to stop. 22 Q. Lost several days of school and 23 a track meet due to anxiety and 24 distractions? 25 A. Uh-huh (yes).</p>
Page 79	Page 81
<p>1 A. Yeah. Like, I was -- like 2 that was the -- that first emotional, 3 like it was kind of an emotional 4 breakdown. So like, I had no --- 5 nowhere to go and no one had no idea 6 what to do. So that I had no choice 7 but to go home. 8 Q. And then, you say you -- you 9 felt threatened and unsafe after April 10 14th, and that's because you felt that 11 people would -- would -- thought you 12 were evil or something? 13 A. Yeah. Basically for speaking 14 out against Mrs. Lyons. 15 Q. Did anyone say anything to you 16 about that? 17 A. A few people have, yeah. 18 Q. So after the March 20th School 19 Board meeting, who said anything to 20 you about it? 21 A. The day after --- right before 22 the meeting with --- with the whole 23 drama with Dr. Shank and Mr. Becker, a 24 girl, Julie Ulsh, she basically told 25 me like, how that you were mental.</p>	<p>1 Q. What happened with that? 2 A. That's when I --- it was 3 literally that --- the whole week 4 after. Everything after April 14th. 5 Like that whole week, I was just kind 6 of like mildly depressed and I 7 couldn't focus in school and my grades 8 were starting to fail. And I couldn't 9 focus at all. 10 Because I was just so like, 11 upset and aggravated with everything 12 that happened and how the three of us 13 were mistreated. And how people 14 looked to us as like we were some kind 15 of, like, monsters trying to destroy 16 drama club. 17 Q. It said lost friends because I 18 spoke against Mrs. Lyons. Who stopped 19 being your friend? 20 A. Just certain people, the club 21 members, just stopped talking to me. 22 Q. Who were they? 23 A. Sorry. Stacey Munsier. I 24 can't say her last name. 25 Q. Stacia --- how do you spell her</p>

21 (Pages 78 to 81)

Page 82	Page 84
<p>1 last name? 2 A. I do not know. 3 Q. Munsier, M-U-N-S-I-E-R? 4 A. Uh-huh (yes). 5 Q. Good enough? 6 A. Yeah. 7 Q. Yes? 8 A. Yeah. 9 Q. Who else? 10 A. Ryan Sheetz. 11 Q. Ryan --- 12 A. Sheetz. 13 Q. --- Sheetz? Like the gas 14 station, Sheetz? 15 A. Yeah, I think so. 16 Q. Okay. 17 A. It's just a few, like a few 18 people that --- none of my like close 19 friends. People just stop talking to 20 me. Like there are people like, in 21 drama, like, hey how's it going kind 22 of thing. There's a lot of people 23 that stopped doing that. 24 Q. Okay. 25 A. So, basically --- but at the</p>	<p>1 Q. So you say after the School 2 Board meeting, the doors to the 3 auditorium were locked after 4 rehearsal? 5 A. Yes. 6 Q. Then you say, after finding the 7 doors by the bathroom unlocked, I went 8 on stage and sat next to Cassidy 9 Kauffman, Lilly Glick, and Haley 10 Richard? 11 A. Yes. 12 Q. The whole cast was on stage 13 listening to people who went to the 14 School Board meeting and telling 15 everyone their experience and love for 16 the club? 17 A. Yes. 18 Q. Okay. 19 So do you have any idea why 20 that front door was locked? 21 A. No. 22 Q. Did ---? 23 A. I --- actually, sorry. 24 Q. Go ahead. 25 A. I was told by two people, one</p>
Page 83	Page 85
<p>1 end, like everything --- after like a 2 lot of things settled, basically they 3 started like --- because they just 4 started --- started talking back to me 5 because I think a lot of things 6 started to pass over time. But at the 7 moment --- in the moment, like I got 8 no responses from some people. 9 Q. Then it said I have lost joy in 10 performing theater and music. Is that 11 true? Even now you don't do that? 12 A. I --- as much as I want. I --- 13 I have a fear of like, now being 14 judged in the background or something 15 from when that happened. It --- it's 16 a passion of mine, but I can't enjoy 17 because of how everything that 18 happened, how it all turned out. And 19 I don't want it to happen again. 20 Q. Okay. Okay. 21 We're going to talk a little 22 bit about this auditorium situation 23 after the School Board meeting. 24 Okay? 25 A. Okay.</p>	<p>1 of them being Cassidy Kauffman, saying 2 that it was for safety reasons. 3 Q. Did someone feel that their 4 physical safety was threatened? 5 A. No. 6 Q. That you're aware of? 7 A. Yes. 8 Q. Someone could have said that, 9 you just don't know. 10 Right? 11 A. Yes. 12 Q. Okay. 13 A. And how --- and they had to be 14 escorted for the bathroom, and they 15 had to be escorted by one of the 16 adults. 17 Q. Who --- what other adults were 18 in that room? 19 A. It was Mrs. Lyons and Abby 20 Hartenstine. 21 Q. And for the record, could you 22 tell us who Abby Hartenstine is? 23 A. She's the Assistant Director, 24 and she's also a 5th grade teacher at 25 the elementary school.</p>

22 (Pages 82 to 85)

Page 86	Page 88
<p>1 Q. Okay.</p> <p>2 Were you required to be at that</p> <p>3 meeting in the auditorium?</p> <p>4 A. No. It was a rehearsal so I</p> <p>5 assumed everyone's going to be</p> <p>6 rehearsing.</p> <p>7 Q. Including yourself?</p> <p>8 A. Yes. I planned on going back</p> <p>9 to rehearsals as soon as the day was</p> <p>10 over anyways.</p> <p>11 Q. So did --- did you show up for</p> <p>12 rehearsal, and then were excused to</p> <p>13 attend the meeting?</p> <p>14 A. I went to the meeting because</p> <p>15 the meeting started before the</p> <p>16 rehearsal.</p> <p>17 Q. Okay.</p> <p>18 A. And then, as soon as the</p> <p>19 meeting was done for our portion, I</p> <p>20 went back. We all went back to</p> <p>21 rehearsal. Except I went before</p> <p>22 Jordan and Haley.</p> <p>23 Q. So how does it work with</p> <p>24 rehearsal? Does the entire play</p> <p>25 rehearse every day?</p>	<p>1 Board meeting, yes.</p> <p>2 Q. So in your complaint, you</p> <p>3 called it a lockdown. But if it was a</p> <p>4 --- but do you understand what a</p> <p>5 lockdown is?</p> <p>6 A. No.</p> <p>7 Q. Okay.</p> <p>8 When you hear the word in the</p> <p>9 news, public school lockdown ---?</p> <p>10 A. Yeah, yeah. My --- yes.</p> <p>11 Q. Okay.</p> <p>12 What --- what does that mean?</p> <p>13 A. It's basically, you got to lock</p> <p>14 --- like lock the doors, close the</p> <p>15 windows, and like everyone like kind</p> <p>16 of like, not in hiding but away from</p> <p>17 anywhere of like where people can get</p> <p>18 in.</p> <p>19 Q. Because you have an active</p> <p>20 shooter.</p> <p>21 Right?</p> <p>22 A. An active shooter, yep.</p> <p>23 Q. Okay.</p> <p>24 So when you use the word</p> <p>25 lockdown in your complaint, do you ---</p>
Page 87	Page 89
<p>1 A. No. First --- for the first</p> <p>2 couple months, it's broken down to</p> <p>3 like blocking, dancing, and vocals.</p> <p>4 Q. Okay.</p> <p>5 A. And by the time, like March</p> <p>6 20th. It's like a month before the</p> <p>7 show. So blocking should be complete,</p> <p>8 dancing should be freshened up. I</p> <p>9 believe that night was like a review</p> <p>10 of the dance rehearsals or run</p> <p>11 through. I can't remember what it was</p> <p>12 actually supposed to be. I'm pretty</p> <p>13 sure it's supposed to be a run through</p> <p>14 of like certain scenes, but that</p> <p>15 didn't happen.</p> <p>16 Q. Did you have a scene where</p> <p>17 Crutchie was going to be rehearsing?</p> <p>18 A. Yes.</p> <p>19 Q. Okay.</p> <p>20 So you had to be there.</p> <p>21 Correct?</p> <p>22 A. I had to be there.</p> <p>23 Q. Were you late for that meeting,</p> <p>24 for the rehearsal?</p> <p>25 A. Yes. Because of the School</p>	<p>1 do you feel like you had a situation</p> <p>2 where you had an active shooter?</p> <p>3 A. No.</p> <p>4 Q. Okay.</p> <p>5 So --- so I know you're using</p> <p>6 the word lockdown because the front</p> <p>7 door was locked to the auditorium?</p> <p>8 A. Uh-huh (yes).</p> <p>9 Q. Yes?</p> <p>10 A. Yes.</p> <p>11 Q. Okay.</p> <p>12 And --- but the side door was</p> <p>13 open near the bathrooms ---</p> <p>14 A. Yes.</p> <p>15 Q. --- so that people could use</p> <p>16 that and come in and go out.</p> <p>17 Correct?</p> <p>18 A. Yeah, and they had to be</p> <p>19 escorted by an adult.</p> <p>20 Q. Okay.</p> <p>21 Do you know whether Jared</p> <p>22 Mazeika's parents asked for that to</p> <p>23 occur?</p> <p>24 A. No.</p> <p>25 Q. Do you know whether or not it</p>

23 (Pages 86 to 89)

Page 90	Page 92
<p>1 would be confidential information if 2 his parents, in fact, had asked that 3 to occur? 4 A. Yes. 5 Q. But would it be confidential? 6 A. No. Sorry, no. No. 7 Q. Do you know either way? 8 A. No. 9 Q. Okay. 10 A. Sorry. 11 Q. That's okay. 12 A. I'm just trying to ---. 13 Q. It's all right. 14 So I'm going to move on to 15 subparagraph (b) here and paragraph 14 16 of your answer. And you say, one 17 student referred to Jordan, Haley, and 18 I as, and quote, mental. This brought 19 no rebuke or response from Mrs. Lyons 20 or Ms. Hartenstine. Was that Ms. Ulsh 21 --- 22 A. Yes. 23 Q. --- who said that? She said it 24 again? 25 A. She said it --- yeah. That's</p>	<p>1 don't know what they did. I assumed 2 they can't rehearse because half the 3 cast was at the meeting. 4 Q. Okay. 5 A. So I think --- I have no idea 6 of what her intentions were. 7 Q. Okay. 8 You didn't ask her? 9 A. No. I was --- I didn't think 10 it would've been my place to ask why 11 she sent people to the School Board 12 meeting. 13 Q. Were you present for any of the 14 conversations? Once you sat down next 15 to Cassidy, what did you hear? 16 A. I heard, like certain people 17 say drama club is --- isn't fair. 18 It's important and no one can, like, 19 destroy it. Or some people said like, 20 drama club is --- is a --- is a place 21 of like, you know, happiness and like 22 be able to be yourself. It was how 23 people liked referring to like what 24 drama club is and also kind of saying 25 that Mrs. Lyons was the director.</p>
Page 91	Page 93
<p>1 the time where she said it the first 2 time. And then she told me 3 specifically the day after. 4 Q. And then, it says once the 5 conversations were over, we ran 6 through a few of the dancing numbers. 7 That's correct? 8 A. Correct. 9 Q. Yes? And the conversations 10 were about what was said at the School 11 Board meeting, and by whom or no? 12 A. When --- is that whenever 13 everyone was sitting down? 14 Q. Yes. 15 A. Yes. It was all the --- it was 16 all the --- just the kids who were at 17 the School Board meeting. 18 Q. Okay. 19 And why were they talking about 20 the School Board meeting at rehearsal? 21 A. Well, half the --- because half 22 of rehearsal --- like, people --- 23 Lyons gave people a choice to attend 24 the meeting and like, you know, 25 support the drama club or stay and, I</p>	<p>1 Q. So mostly positive comments 2 about ---? 3 A. About drama club and her. 4 Q. Okay. 5 And of course, you didn't agree 6 with any of that? 7 A. Right. 8 Q. Okay. 9 So then, in --- in subparagraph 10 (d), you say towards the end of 11 running through the numbers, I 12 approached Mrs. Lyons and asked if we 13 could speak in public. She agreed. 14 A. I mean private. 15 Q. You meant private? 16 A. Yeah. 17 Q. Okay. 18 So we'll correct that. After 19 that, we stay --- you say rehearsal 20 was over and she asked Jordan and I to 21 follow her and Ms. Hartenstine came 22 along too. 23 Is that correct? 24 A. Yes. 25 Q. All right.</p>

24 (Pages 90 to 93)

Page 94	Page 95
<p>1 So when you said towards the 2 end of running through the numbers, 3 you went over to her and said Mrs. 4 Lyons, can I speak in public? What 5 were you thinking then? 6 A. I was thinking -- I just want 7 to kind of make amends for everything 8 that happened and say like, this is 9 why I went to the meeting. I -- 10 because I was hurt twice and there was 11 no investigation of like why and I'm 12 still confused on why you called me 13 out twice and what I did that was 14 wrong doing. It was humiliation. 15 And how, somehow, she's 16 treating -- she treated some certain 17 people, and like you know, calling 18 people out in the email. And I said, 19 I want to make amends and try to make 20 this show the best Newsies as 21 possible. 22 Q. So when you talk about making 23 amends, if you don't feel like you've 24 done anything wrong, what --- what 25 were you going to say?</p>	<p>1 pleasant experience in the play? 2 A. No. For everyone -- sorry. 3 Q. For -- for everyone? You -- 4 you just wanted her to forget 5 everything that you all just did so 6 that you all could have a good 7 experience at -- through the end of 8 the play. 9 Is that correct? 10 A. Yes and no. 11 Q. Okay. 12 Tell me about the no. 13 A. No because I kind of don't want 14 her to forget. Because we were hurt 15 and upset and we've been to her a 16 couple times saying like we were hurt 17 about certain things. 18 Q. So when you approached Mrs. 19 Lyons to make amends, you wanted Mrs. 20 Lyons to make amends? You didn't want 21 to make amends with Mrs. Lyons? 22 A. Correct. 23 Q. So when you went to her and 24 approached her, you were really in 25 your mind, saying Mrs. Lyons can we</p>
Page 95	Page 97
<p>1 A. Can you repeat the question? 2 Sorry. 3 Q. Sure. You want to make amends. 4 Do you know what --- do you know what 5 that means? 6 A. Yeah. 7 Q. You make --? 8 A. I want to make up. 9 Q. You want to make up? 10 A. Yeah. Yes. Yeah. 11 Q. Okay. 12 So in order to make up, you 13 have to at least meet her halfway. 14 Right? 15 A. Yeah. 16 Q. Okay. 17 So what were you willing to 18 give up in order to meet her halfway 19 and shake hands? 20 A. I have no idea. 21 Q. Okay. 22 Did you --- when you wanted to 23 make amends, did you just want her to 24 forget about everything that you said 25 about her so that you can have a more</p>	<p>1 speak in private so that you can 2 apologize to me and I can get through 3 this? 4 A. Basically. 5 Q. And then, rehearsal was over 6 and she asked Jordan and I --- and I 7 to follow her, and Ms. Hartenstine 8 came along too. 9 Okay. 10 And then it says we followed 11 her down the hallway, and then asked 12 to speak with us individually. She 13 spoke with me first, and Jordan went 14 back and waited. 15 Okay. 16 So she brings you both down, 17 but then separates you so that she 18 could talk to you individually? 19 A. Correct. 20 Q. And then --- okay. So tell me 21 about that conversation. Who spoke 22 first? 23 A. I spoke first. 24 Q. Okay. 25 And what did you say?</p>

25 (Pages 94 to 97)

Page 98	Page 100
<p>1 A. I basically said how I was hurt 2 twice, and how I'd been hurt because 3 of things that you -- you, like had 4 us called out twice. And some of the, 5 like, the ways that rehearsals 6 starting, and like not starting on 7 time. And I kind of just wanted to 8 like, you know, make -- make amends 9 or some -- I want kind of an apology 10 from that. But I didn't specify like 11 I wanted an apology. 12 Q. You didn't say -- 13 A. No. 14 Q. -- I want an apology? 15 A. I did not say that. 16 Q. How would she know what you 17 wanted if --? 18 A. She probably didn't. I think 19 it was just for my benefit to get the 20 stuff off my chest, and try to tell 21 her that this is how I feel. 22 Q. Okay. 23 Then you say, halfway through 24 Mrs. Jones entered and observed as a 25 neutral or mediator.</p>	<p>1 A. Yes. 2 Q. Okay. 3 And then, in response to 4 Question Number 12, you said I never 5 had a conversation with Dr. Shank ever 6 about Mrs. Lyons? 7 Is that true? 8 A. Correct. 9 Q. Okay. 10 Why didn't you talk to Dr. 11 Shank about Mrs. Lyons? 12 A. I never had a reason to until 13 the defamation email. 14 Q. Okay. 15 And then the defamation email 16 that was not directed to you, was that 17 -- I think we talked a little bit 18 earlier where you said I was running 19 around trying to find somebody to help 20 me. Dr. Shank -- was -- was Dr. 21 Shank one of those people that 22 could've helped you? 23 A. Yes. 24 Q. And she was not there? 25 A. Correct.</p>
Page 99	Page 101
<p>1 Right? 2 A. Yes. 3 Q. This is Ms. Maria Jones and 4 she's a secretary? 5 A. Correct. 6 Q. Okay. 7 A. For Dr. Shank. 8 Q. And then -- so basically you 9 were talking and she was listening? 10 A. Yes. 11 Q. And did she say anything to 12 you? No? You're shaking your head 13 no. 14 A. No. 15 Q. Okay. 16 She said nothing. And then, 17 Mrs. Hartenstine was there and Mrs. 18 Jones showed up. And they didn't say 19 anything either. 20 Right? 21 A. Nope. 22 Q. Nope. And then, after you were 23 finished speaking, you said I asked 24 her for a hug and hoped that we can 25 move on and she gave you a hug?</p>	<p>1 Q. Okay. 2 And it also says you never had 3 a conversation with Mr. Becker about 4 Mrs. Lyons? 5 A. Correct. 6 Q. Okay. 7 Why not? 8 A. Because I never had the courage 9 to go up and tell him how I felt. 10 Q. Okay. 11 And then, I'm asking in -- in 12 Paragraph 11 essentially, who did you 13 discuss -- what would be said at the 14 Board meeting? With whom did you 15 discuss the language of what would be 16 said at the Board meeting before it 17 happened? 18 A. I went home, and then -- like 19 her -- Haley and Jordan came over and 20 we kind of discussed like that -- 21 what we were going to say kind of. 22 It's kind of -- we made a nice 23 PowerPoint of what we wanted to say. 24 Q. Okay. 25 And then it's got Drew Eck and</p>

26 (Pages 98 to 101)

Page 102	Page 104
<p>1 Tara Eck, his parents came over as 2 well? 3 A. Yeah. My --- yeah. Their 4 parents were there, my parents were 5 there as well. 6 Q. Okay. 7 So at whose house were you? 8 A. My house. 9 Q. Okay. 10 So at the Ferrizzi residence, 11 and then Jordan and his parents were 12 there? 13 A. Yes. 14 Q. And then Haley was also there? 15 A. Yes. 16 Q. They all came over? 17 A. Yes, the seven of us. 18 Q. And do they live near you? 19 A. Yes they do. 20 Q. Okay. 21 A. They're not --- like, it --- 22 probably two miles. 23 Q. Two miles? 24 A. Yeah. 25 Q. That's pretty far.</p>	<p>1 Mrs. Lyons and how we --- what we 2 felt. 3 Q. Okay. 4 And did Jordan prepare his 5 speech at your house? 6 A. Yes. 7 Q. And were his parents advising 8 him on how to prepare that speech? 9 A. He did it all himself. 10 Q. Okay. 11 Did his parents review what he 12 said --- was going to say? 13 A. Yes. 14 Q. Okay. 15 And Haley, did she also speak 16 at the public School Board meeting? 17 A. Yes. 18 Q. And did anyone review what she 19 was going to say? 20 A. Yes. 21 Q. Who reviewed what she was going 22 to say? 23 A. I can't remember. 24 Q. Did --- did anyone help her 25 with her language in terms of what was</p>
Page 103	Page 105
<p>1 A. Is that far? 2 Okay. 3 Q. Well I mean, it's not like 4 you're walking across the street. 5 A. Okay. All right. 6 I wasn't sure about that 7 question. 8 Q. So were they invited to come 9 and talk about ---? 10 A. They were already there by the 11 time I got home. 12 Q. Okay. 13 So do you think your --- did 14 your parents invite them? 15 A. Yes. 16 Q. Okay. 17 And this was all in preparation 18 for what would be said at the School 19 Board meeting? 20 A. Yes. 21 Q. Okay. 22 And did Jordan say something 23 differently than you did? 24 A. Yes. We all planned --- we all 25 wanted to share, like, our story about</p>	<p>1 going to be said? 2 A. I don't remember. 3 Q. And then, as far as your 4 speech, did you write that on your 5 own? 6 A. Yes. 7 Q. Did your parents help you with 8 the language of it? 9 A. Yes. 10 Q. Okay. 11 And did they review it and 12 approve it? 13 A. Yes. 14 Q. Okay. 15 Was there anyone else at your 16 home that was part of this 17 collaboration of the three of you to 18 speak at the public School Board 19 meeting? 20 A. Well I know Drew Eck, my dad, 21 Vince Ferrizzi, and Tara all spoke. 22 But they all had, like, their ideas in 23 their head. 24 Q. Okay. 25 But there was no one else in</p>

27 (Pages 102 to 105)

Page 106	Page 103
<p>1 the house is what I'm asking. That 2 participants ---? 3 A. No, yeah. It was just us 4 seven. 5 Q. Okay. 6 So in paragraph 10, you respond 7 by saying I'm asking you to tell me 8 what you exactly said. And this is 9 what you said, and I'm going to ask 10 you some questions about what you 11 said. Or at least what you wrote --- 12 A. Okay. 13 Q. --- that you said. 14 Okay? 15 It says I was interrupted 16 twice, and not allowed to speak 17 directly about Mrs. Lyons. So who 18 interrupted you twice? 19 A. The Chairman. 20 Q. And again, why did he interrupt 21 you? 22 A. Because I wasn't allowed to 23 share any names about negativity or 24 character assignments. 25 Q. Okay.</p>	<p>1 Then it says, I expressed 2 concern that Mrs. Lyons was not 3 running the program in a way that 4 allowed students to learn and grow in 5 their acting abilities? 6 A. Correct. 7 Q. Okay. 8 What did you mean by that? 9 A. Because I felt like she really 10 --- back to our characters. Just 11 telling us like --- I don't know --- 12 I'll just try to explain it. 13 Like, she'd give us, like any 14 kind of like character notes, like 15 maybe you should try to pretend to be 16 more excited about this or try to be 17 more like, you know, open or try to 18 use like more eye contact. 19 It's more like she really 20 critiqued us more about how we looked 21 instead of --- I mean how we acting 22 more like how we looked. And I feel 23 like as an actor, I didn't really grow 24 much through that. 25 Q. I expressed concern about the</p>
Page 107	Page 109
<p>1 And then it says, I stated my 2 concern that there was no outlet for 3 my concerns about Mrs. Lyons, and that 4 Jordan should not have been defamed in 5 the email. So are those two issues 6 related? No outlet, and the --- the 7 defamation about Jordan? 8 A. Yeah. 9 Q. Okay. 10 That was you running around the 11 building trying to find some help --- 12 A. Correct. 13 Q. --- breaking down emotional, 14 and not getting any support --- 15 A. Correct. 16 Q. --- or no one reading the 17 email? 18 Is that correct? 19 A. Correct. 20 Q. Okay. 21 And then you just filling out 22 the complaint at Mr. Becker's office 23 and going back to 5th period? 24 A. Correct. 25 Q. All right.</p>	<p>1 lack of oversight by the Board and 2 administration of Mrs. Lyons as a 3 theater teacher. 4 What did you say exactly about 5 that? 6 A. I was saying how so many --- 7 like throughout the years, people have 8 gotten problems about Mrs. Lyons and 9 other like circumstances around 10 involving drama club and what she's 11 doing and how nothing's been brought 12 up, nothing's been like --- well I 13 mean nothing's been brought up, 14 nothing's been brought up about her 15 like for things to get changed. We 16 keep passing --- they keep passing the 17 books over. They kept passing it 18 over, and it's like we'll get it. 19 Q. Then you say I suggested that 20 she should have more training and 21 oversight in dealing with students? 22 A. Correct. 23 Q. Okay. 24 Anything more specific about 25 what you said in --- in that thing?</p>

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<p>1 A. Well I meant there she --- 2 she's a business woman and a mom. So 3 I understand that she's not a teacher. 4 So if she didn't have like a 5 specialty, like how teachers work with 6 like students. And yeah, she's a mom, 7 but moms work differently than how 8 teachers would work. Like being a --- 9 being a teacher, educating myself, 10 like I can tell the difference between 11 like a mom and an educator. And an 12 educator needs to like teach kids and 13 be openly willing to, like, express 14 things. 15 Well Mrs. Lyons kind of like 16 --- like how she calls people out. 17 You don't --- you shouldn't --- you 18 can't do that as a teacher. Unless 19 it's like jokingly, but it's not like 20 anything like negative. You shouldn't 21 do that. 22 Q. So she's too business like? 23 A. Yes. 24 Q. She's too real world --- 25 A. Yeah.</p>	<p>1 Q. It was not him? 2 A. No. He --- he didn't state --- 3 like, there are no character 4 assignments. 5 Q. He's not the one who said it? 6 A. I don't think so --- I don't 7 remember, sorry. I don't remember. 8 Q. You don't remember if that's 9 true information in your Answer to an 10 Interrogatory? 11 A. Correct. 12 Q. Okay. 13 A. Sorry. I didn't ---. 14 Q. And --- that's fine. And then 15 it says School Board President Mr. 16 Pollock, which you don't know if 17 that's true, and or attorney for the 18 School Board. Do you know if the 19 attorney for the School Board said 20 anything? 21 A. I don't remember. 22 Q. Do you know if that's true 23 information? 24 A. I don't know. 25 Q. You don't know if that's true</p>
Page 111	Page 113
<p>1 Q. --- for high school students? 2 A. Yeah. 3 Q. Is that right? 4 A. Correct. 5 Q. You said I wish to say more 6 about Mrs. Lyons, but was interrupted 7 in my speech twice and told not to 8 name or refer to her. 9 A. Correct. 10 Q. So what would you have said if 11 you weren't interrupted? 12 A. I would've said more about how 13 I was hurt and how, like how I was 14 called out twice. Talked about what 15 happened at the mosaic concert, and 16 talked about other things that we 17 missed at our rehearsals. Which like 18 I said earlier. 19 Q. Okay. 20 I asked you who made the 21 comment to you School Board. You said 22 the School Board President Mr. 23 Pollock. Does that refresh your 24 recollection about his name? 25 A. I don't --- it wasn't him.</p>	<p>1 or not? 2 A. Correct. 3 I just know --- there was 4 someone said --- the person who told 5 me to stop using character --- any 6 negative comments about somebody. It 7 was one guy, it was the same guy. I 8 just don't remember who. 9 Q. So there's something here about 10 Jared Mazeika in the early morning 11 hours of April 14th thanking the 12 students in the show for being 13 supporting --- supportive of him 14 throughout his disagreements with 15 Jordan and saying bitches will be 16 bitches in reference to me. 17 A. Yeah. 18 Q. What's that about? 19 A. So I'm going to start with 20 this. So we --- like the senior 21 speeches when I talked about like 22 families, it's kind of like it's --- 23 it's --- that's what he made his 24 speech. And his went on and on about 25 like how that this year was a hard</p>

29 (Pages 110 to 113)

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<p>1 year for him because he was done in 2 the ground and some people can be so 3 evil, but you guys help raise me up. 4 And then halfway through, I was 5 just annoyed about it. So I got up 6 and walked to my backpack to check my 7 phone and see if there's any messages. 8 And I went to go play a game called 9 Hay Day. And as soon as I got up and 10 walked to my phone, he stopped 11 talking. And there was like --- like, 12 a silence the whole entire time I was 13 checking my phone, playing my game for 14 a second. I put it down. I walked 15 back to my seat, and then he said 16 bitches shall be bitches and then 17 continued his speech. 18 And either our --- I have --- 19 how do we call them? Witnesses that 20 saw Misses --- Mrs. Lyons, Mrs. 21 Hartenstine talking about basically 22 what I was doing, walking to my phone. 23 And I'm assuming they were thinking I 24 --- I was texting somebody about what 25 was going on.</p>	<p>1 to Question 2. You state Dr. Shank 2 and Mr. Becker spoke at a cast meeting 3 on March 21st, 2019. At this meeting, 4 they said that they would tolerate no 5 more negative statements about the 6 play or about Mrs. Lyons. 7 If anyone disagreed, they could 8 quit at that meeting. At this time, 9 Haley Hartline raised her hand and was 10 acknowledged. She said I quit and left 11 the room. Then they asked, does 12 anyone else want to quit? 13 What happened there? 14 A. What do you mean by that? 15 Q. Well what was the dynamic? Why 16 --- why do you think Haley really 17 quit? 18 A. Because of how --- Jordan's 19 suspension. 20 Q. Because Jordan was already ---? 21 A. Jordan was already suspended at 22 this time. And she knew about it. 23 And that's why she quit. Because he 24 was suspended, restricted of all drama 25 club titles because he was the</p>
Page 115	Page 117
<p>1 Q. Well you were annoyed so you 2 got up and walked over to check your 3 messages? 4 A. Yes. 5 Q. Did anyone get up and check 6 their messages while you were 7 speaking? 8 A. I don't know. 9 Q. Did anyone leave their seat at 10 all while you were speaking? 11 A. Not that I know of. Mine was 12 really short. Like, a minute not 13 even. Jared's went on for almost 70 14 minutes. And I forgot to add, he also 15 mentioned in his speech that 16 referenced Mrs. Lyons. Said don't 17 ever mess with this woman. He 18 literally said that to everybody. 19 He's like, do not mess with this 20 woman. 21 Q. Okay. 22 He was protecting her? 23 A. Pretty much. 24 Q. On page 3 of your Answers to 25 Interrogatories, this is in response</p>	<p>1 President. And he was restricted of 2 that title and he was removed from the 3 school show. 4 Q. Do you --- I did ask this in 5 your Answers to Interrogatories, but 6 --- but do you know if Jordan has a 7 history of being emotional? 8 A. No. 9 Q. How long have you known Jordan? 10 A. Four years. 11 Q. And in --- in your presence, 12 he's never been emotional? 13 A. Never. He's been one of the 14 only friends in my entire life that's 15 always been my side and gave me 16 inspirational, like comments and 17 messages to like, you know, make me 18 feel better. 19 Q. So Haley quit the play? 20 A. Yes. 21 Q. So then what --- who was --- 22 what was her part? 23 A. She was one of the main 24 Newsies. 25 Q. One of the main Newsies? And</p>

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<p>1 then who took over for her?</p> <p>2 A. Bryn Donoff. Because that ---</p> <p>3 that rehearsal that day, I was --- I</p> <p>4 think it was that day. I could be</p> <p>5 wrong. It was because of that ---</p> <p>6 that Thursday or Friday is when we</p> <p>7 have rehearsal. And the first day,</p> <p>8 Mrs. Lyons says like we have a change</p> <p>9 in the cast line up and gave the parts</p> <p>10 to other people that were Jordan and</p> <p>11 Haley's.</p> <p>12 Q. And who took over Jordan's?</p> <p>13 A. Edie Feather.</p> <p>14 Q. Was --- was there --- is there</p> <p>15 any other reason why Haley would've</p> <p>16 quit the play other than the fact that</p> <p>17 somebody else got suspended?</p> <p>18 A. No. I think it's because it</p> <p>19 happened to Jordan. And she is --- is</p> <p>20 --- they're dating. And ---.</p> <p>21 Q. Are they still dating?</p> <p>22 A. Yes.</p> <p>23 Q. I just want you to turn to tab</p> <p>24 number four in the booklet ---</p> <p>25 A. Okay.</p>	<p>1 had about whether or not Mrs. Lyons</p> <p>2 was addressed?</p> <p>3 A. Yes.</p> <p>4 Q. Okay.</p> <p>5 Does it solve those problems</p> <p>6 that you had with her?</p> <p>7 A. Most of them.</p> <p>8 Q. Anything that's outstanding at</p> <p>9 this time?</p> <p>10 A. No.</p> <p>11 Q. All of them?</p> <p>12 A. Huh?</p> <p>13 Q. All of them?</p> <p>14 A. No.</p> <p>15 Q. What --- what --- what problem</p> <p>16 that you've raised in this lawsuit</p> <p>17 that you asked the School Board to</p> <p>18 address has not been addressed in this</p> <p>19 memo?</p> <p>20 A. I just --- that --- all right.</p> <p>21 Two things. During --- during the</p> <p>22 bios, bio sheet. Everyone has to</p> <p>23 write their own bios, and everyone has</p> <p>24 like a quote they got to say. And the</p> <p>25 quote she published that Jared Mazeika</p>
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<p>1 Q. --- in front of you. We're</p> <p>2 going to mark that Plaintiff 1. And</p> <p>3 you're --- first you're going to give</p> <p>4 that to the Court Reporter so he can</p> <p>5 mark it.</p> <p>6 ---</p> <p>7 (Whereupon, Plaintiff's</p> <p>8 Exhibit 1, Musical</p> <p>9 Production Team</p> <p>10 Expectations Letter, was</p> <p>11 marked for</p> <p>12 identification.)</p> <p>13 ---</p> <p>14 BY ATTORNEY O'DONNELL:</p> <p>15 Q. I want to give you a moment to</p> <p>16 take a look at what we've marked as</p> <p>17 Plaintiff 1.</p> <p>18 A. Okay.</p> <p>19 Q. Did you --- did you --- have</p> <p>20 you read it in full?</p> <p>21 A. Yes.</p> <p>22 Q. Do you understand it?</p> <p>23 A. Yes.</p> <p>24 Q. Does that --- does that answer</p> <p>25 a lot of the unanswered questions you</p>	<p>1 wrote was basically against Jordan,</p> <p>2 and how he was brought down. Kind of</p> <p>3 --- what he said in his senior speech.</p> <p>4 Like, I was brought down. You guys</p> <p>5 are the ones that brought me up. And</p> <p>6 she didn't tell him not to publish it,</p> <p>7 but she published it anyways.</p> <p>8 And then how at the School</p> <p>9 Board meeting --- not the School Board</p> <p>10 meeting. Cast and crew party, she</p> <p>11 went on --- she let Jared go on about</p> <p>12 basically us and how that he was</p> <p>13 brought down, and we brought him up.</p> <p>14 Basically at Jordan. And her herself</p> <p>15 even said that Jared, you had a hard</p> <p>16 year and you did really well doing</p> <p>17 what you did. Basically, and how you</p> <p>18 killed it.</p> <p>19 Q. And you have a problem with</p> <p>20 that why?</p> <p>21 A. Because she --- she violates</p> <p>22 some of the codes --- some of the ---</p> <p>23 easier. There's still --- was it</p> <p>24 verbal abuse?</p> <p>25 Q. You think that was ---?</p>

31 (Pages 118 to 121)

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<p>1 A. Personality abuse. 2 Q. Okay. All right. 3 ATTORNEY O'DONNELL: 4 Those are all the 5 questions I have. Thank you 6 very much. 7 THE WITNESS: 8 Thank you. 9 ATTORNEY READY: 10 All right. 11 I have a few. 12 --- 13 EXAMINATION 14 --- 15 BY ATTORNEY READY: 16 Q. How long were you in the drama 17 program at Oley Valley? 18 A. All four years. 19 Q. Okay. 20 You talked about happy papers? 21 A. Yes. 22 Q. Is that something that Mrs. 23 Lyons implemented? 24 A. No. 25 Q. What --- what does that go back</p>	<p>1 around, eat for an hour. And then 2 sometimes, like --- like before all 3 this, it was more like we got our 4 happy papers already. We read them, 5 and we shared them and talked the 6 whole time. Played games or sang 7 songs together. 8 But last couple shows, I don't 9 know. I think two years ago, when she 10 started to like take the happy papers 11 and started saying good things about 12 everybody. So that was a new 13 tradition that she started a couple 14 years ago. 15 Q. Okay. 16 A. And that went along. And after 17 she was done talking about happy 18 papers, we cleaned up and then we went 19 home to come back the following day. 20 Q. Okay. 21 A. Or that morning. 22 Q. Okay. 23 The following day when you came 24 back, Mrs. Lyons spoke to you. You 25 described that a little bit. I ---</p>
Page 123	Page 125
<p>1 to? 2 A. I --- it was before my time. I 3 don't know how long ago it started, 4 but --- 5 Q. Is it --- I mean, is it a drama 6 club tradition? Is that what ---? 7 A. Yes. 8 Q. Okay. 9 And then I want to ask you 10 about this --- this after party you 11 talked about on --- 12 A. Okay. 13 Q. --- on April 14th. Can you 14 describe just the atmosphere of --- of 15 this --- what --- what happened with 16 that? 17 A. So we kind of like, you know, 18 put our costumes away, see our guests 19 for like the final show. And then 20 when they leave, we get changed into 21 like our normal clothing, and then we 22 have like kind of a dinner party. So 23 normally there's like pizza and 24 cookies and sometimes other like 25 snacky foods. And we just hang</p>	<p>1 can you describe a little bit though, 2 generally, what the purpose is of this 3 set strike? And you described a 4 little bit to --- to Ms. O'Donnell, 5 but what --- what else --- what else 6 typically happens at these? 7 A. Typically --- so we get there, 8 we do a set strike, we get jobs. And 9 after that, we normally do a last 10 little activity which is like 11 sometimes we have --- we have a ball. 12 We fill a ball and say one nice thing 13 about the show or drama club. And 14 then --- and there's another thing 15 that we do. It's like you all --- you 16 get into a circle and you stare into 17 people's faces and like make direct 18 eye contact and share, like, feelings 19 verbally. Which is kind of cool, and 20 we normally do that. But never, ever 21 have we done like fun games --- like 22 any kind of fun games or any like last 23 connections or played dodge ball. 24 Like, we never did that before. 25 Q. Okay.</p>

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<p>1 But that was --- that was 2 happening ---? 3 A. That was happening this year. 4 Q. Okay. 5 We had a discussion up front 6 about some of the legal terms that 7 have been used in this lawsuit. And 8 O'Donnell asked you to define things. 9 She also asked you a couple time 10 throughout this whether something was 11 illegal. Can you explain what you 12 understand illegal to mean? 13 A. It --- it's a violation to the 14 law or the Constitution. 15 Q. Okay. 16 And I'm going to ask you about 17 what --- the day that you went to 18 speak to somebody in administration, 19 the --- the email that you got, the 20 defamatory email. Who else talked to 21 you about that email? Other than the 22 people you've already mentioned. 23 A. Yeah. That was basically it. 24 It was basically my friend Alyssa who 25 told me about it, and then I was</p>	<p>1 rehearsal when you got there? 2 A. Yes. 3 Q. And who was there? 4 A. The whole entire cast was 5 sitting in the auditorium, kind of 6 like in a I guess in an apple of a 7 shape or a C shape. And then the 8 person who spoke stood in the middle, 9 and then Mrs. Lyons and Ms. 10 Hartenstine were like at the bottom of 11 the stage. So everyone's here, and 12 then she --- they're on the bottom of 13 the stage, just standing to the side. 14 Q. Okay. 15 So Jordan and Haley were not 16 present. 17 Correct? 18 A. No, they were not. 19 Q. Was anybody else not present at 20 that time? 21 A. Just people who didn't go to 22 rehearsal. Besides like, trying to 23 think. No. Not that I know of. 24 Q. Okay. 25 Do you don't know of anybody</p>
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<p>1 actually in Mr. Shaffer's room at the 2 time. So I was telling him like that 3 wasn't fair. And then that's when I 4 started to go well, I'm trying to find 5 help. 6 Q. Okay. 7 At the School Board meeting 8 after you were done speaking, did 9 anybody tell you that you needed to go 10 back to rehearsal? 11 A. No. 12 Q. Okay. 13 A. I could've gone home. 14 Q. Okay. 15 You choose to go back to 16 rehearsal? 17 A. Yes. 18 Q. Why? 19 A. Because I'm a part of the show 20 and a part of the cast so it's my duty 21 to be there. 22 Q. Okay. 23 At the --- at the meeting that 24 was --- I take it you said there was a 25 meeting on the stage, sort of before</p>	<p>1 else that missed rehearsal at that 2 time? 3 A. Correct. 4 Q. Okay. 5 You mentioned that the door was 6 locked. Who locked the door? 7 A. I have no idea. 8 Q. Okay. 9 Let me make sure I understood 10 this correctly. The --- the following 11 day, there was a school show meeting 12 in the auditorium. 13 Correct? 14 A. Correct. 15 Q. Dr. Shank and Mr. Becker spoke? 16 A. Yes. 17 Q. And at that time, as I 18 understood your testimony earlier, you 19 said they're --- they said there was 20 going to be no more negative 21 statements about Mrs. Lyons and the 22 show. 23 Is that right? 24 A. Correct. 25 Q. Okay. Okay. All right.</p>

33 (Pages 126 to 129)

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<p>1 ATTORNEY READY: 2 I have nothing further. 3 ATTORNEY O'DONNELL: 4 I just have one more 5 follow up. 6 --- 7 REEXAMINATION 8 --- 9 BY ATTORNEY O'DONNELL: 10 Q. With respect to your --- your 11 speech to the School Board, did anyone 12 tell you that that --- strike that. 13 Did anyone advise you that going to 14 the School Board with complaints about 15 your drama club was the appropriate 16 avenue to address your complaints? 17 A. That's --- I --- no. I have no 18 idea. 19 Q. Who --- who gave you the idea 20 to do that? 21 A. It was kind of like --- I don't 22 know. I can't remember. 23 Q. You must have talked about it 24 with your parents. 25 Is that correct?</p>	<p>1 times when she called me out and how I 2 felt unprofessional that was. 3 But after that defamation email 4 and how I couldn't find any help, I 5 realized that I was like maybe I 6 should share my problems because I 7 knew Jordan was going to be at the 8 School Board meeting that night. So I 9 wanted to come along and do it too. 10 Share like my side of the story and 11 what I witnessed. 12 ATTORNEY O'DONNELL: 13 Those are all the 14 questions I have. Thank you. 15 THE WITNESS: 16 Thank you. 17 ATTORNEY READY: 18 Just to follow up on one 19 more thing because I think 20 there may have been some 21 confusion earlier. 22 --- 23 REEXAMINATION 24 --- 25 BY ATTORNEY READY:</p>
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<p>1 A. Yeah. I --- yeah. I knew that 2 Jordan and Haley were already --- I 3 --- I knew Jordan was already going to 4 go to the School Board to speak to his 5 like what --- like, his piece. But 6 what really set me off was that 7 defamation email, that whole day. 8 That's like, this is the last straw. 9 I'm like, this --- something needs to 10 be done. 11 And since I couldn't find no 12 help in the school, that's when I was 13 like I need to make this public. I 14 need to address this issue. And 15 that's when I finally kind of grew --- 16 kind of grew up and said that I need 17 to start standing up. 18 Q. That's when you felt like you 19 grew up, and you felt like you started 20 standing up? 21 A. I think that's when I --- 22 because I always wanted to like tell 23 like, to a higher authority like how I 24 felt very --- like not insecure, but 25 how I was hurt by Mrs. Lyons both</p>	<p>1 Q. Ms. O'Donnell asked you if you 2 got an IEP at any time, and you said 3 you received one after the School 4 Board meeting. Can you explain what 5 you --- what --- what that was? 6 A. I'm pretty --- I'm correct. It 7 --- because that was --- that was the 8 first, like, emotionally --- it was 9 unstable too at the time too. And I 10 think like I cried a little --- I 11 cried for like half of it too, kind of 12 share out my points. 13 So I'm assuming just for like 14 maybe for like school safety, I was 15 like --- it was like they have to 16 address it to make sure like I'm 17 emotionally stable or I'm mentally 18 stable. That's what I got out of it. 19 Q. So the school sent you 20 paperwork? 21 A. Yes. 22 Q. Did --- did you obtain --- I 23 mean, did you meet with someone and 24 --- and get an individualized 25 education plan as a result of that?</p>

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<p>1 A. Nope.</p> <p>2 Q. Okay.</p> <p>3 ATTORNEY READY:</p> <p>4 Nothing further.</p> <p>5</p> <p>6 RE-EXAMINATION</p> <p>7</p> <p>8 BY ATTORNEY O'DONNELL:</p> <p>9 Q. Did your parents -- you --</p> <p>10 did -- I mean, your parents are</p> <p>11 involved in something like that.</p> <p>12 Right? And you just can't be</p> <p>13 given an emotional support plan</p> <p>14 without consent from your parents.</p> <p>15 So you understand that?</p> <p>16 A. Yes.</p> <p>17 Q. Okay.</p> <p>18 Did anyone speak to your</p> <p>19 parents about your emotional</p> <p>20 instability and need for support?</p> <p>21 A. I don't know.</p> <p>22 Q. Okay.</p> <p>23 But clearly you were crying.</p> <p>24 You cried for half a day. You</p> <p>25 testified twice, maybe three times</p>	<p>1 that?</p> <p>2 COURT REPORTER:</p> <p>3 Would you like a</p> <p>4 transcript of this?</p> <p>5 ATTORNEY READY:</p> <p>6 Yes.</p> <p>7 *****</p> <p>8 DEPOSITION CONCLUDED AT 11:40 A.M.</p> <p>9 *****</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p>1 today, that you were emotionally</p> <p>2 unstable and actually broke down on</p> <p>3 one occasion.</p> <p>4 Is that correct?</p> <p>5 A. Correct.</p> <p>6 Q. Okay.</p> <p>7 The school offered to provide</p> <p>8 you with emotional support. Do you</p> <p>9 know whether or not your parents</p> <p>10 signed off on that offer?</p> <p>11 A. I -- I believe they didn't.</p> <p>12 Q. They did not?</p> <p>13 A. They did not.</p> <p>14 Q. Okay. All right. Very good.</p> <p>15 ATTORNEY O'DONNELL:</p> <p>16 That -- that's all the</p> <p>17 questions that I have.</p> <p>18 You good? Great.</p> <p>19 COURT REPORTER:</p> <p>20 Would Counsels -- would</p> <p>21 you like a transcript of this?</p> <p>22 ATTORNEY O'DONNELL:</p> <p>23 Yes, please.</p> <p>24 ATTORNEY READY:</p> <p>25 I'm sorry, what was</p>	<p>1 COMMONWEALTH OF PENNSYLVANIA)</p> <p>2 COUNTY OF BERKS)</p> <p>3 CERTIFICATE</p> <p>4 I, Ian Weeber, a Notary Public in and</p> <p>5 for the Commonwealth of Pennsylvania, do</p> <p>6 hereby certify:</p> <p>7 That the witness, Vincent Ferrizzi,</p> <p>8 whose testimony appears in the foregoing</p> <p>9 deposition, was duly sworn by me on 09/26/2019</p> <p>10 and that the transcribed deposition of said</p> <p>11 witness is a true record of the testimony</p> <p>12 given by said witness;</p> <p>13 That the proceeding is herein recorded</p> <p>14 fully and accurately;</p> <p>15 That I am neither attorney nor counsel</p> <p>16 for, nor related to any of the parties to the</p> <p>17 action in which these depositions were taken,</p> <p>18 and further that I am not a relative of any</p> <p>19 attorney or counsel employed by the parties</p> <p>20 hereto, or financially interested in this</p> <p>21 action.</p> <p>22 Dated the 6th day of November 2019</p> <p>23 <i>Court Reporter</i></p> <p>24 Ian Weeber,</p> <p>25 Court Reporter</p>

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JORDAN ECK, HALEY
HARTLINE and VINCENT
FERRIZZI,

Plaintiffs

NO. 5:19-CV-01873-MAK

vs.

OLEY VALLEY SCHOOL
DISTRICT; TRACY SHANK,
individually and as
Superintendent of the
Oley Valley School
District; CHRISTOPHER M.
BECKER, individually and
as Principal of Oley
Valley High School; and
STACEY LYONS,
individually and as
employee of Oley Valley
High School,

Defendants

JURY TRIAL OF 12
DEMANDED

DEPONENT: LILY GLICK

DATE AND TIME: Thursday, November 14, 2019
at 1:00 p.m.

LOCATION: Oley Valley High School
17 Jefferson Street
Oley, Pennsylvania

BERKS COURT REPORTING SERVICE
By: Lori A. Dilks
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12 Camp Hill, PA 17011

13 Representing the Defendants

14 ALSO PRESENT:

15 Dr. Tracy Shank

16 _____
17 STIPULATION: It has been stipulated by and between
18 counsel that they waive the sealing of the transcribed
19 testimony by the witness and the filing of the original
20 with the Court, and all objections, except as to form,
21 until the time of trial.
22 _____

I N D E X

<u>WITNESS</u>	<u>EXAMINED BY</u>	<u>PAGE</u>
Lily Glick	Mr. Ready	5
	Ms. O'Donnell	7
	Mr. Ready	8
	Ms. O'Donnell	41

EXHIBITS

<u>NUMBER</u>	<u>DESCRIPTION</u>
1	Letter dated March 20, 2019
2	Marla Jones Narrative
3	Discipline Referral Form
4	E-mail dated March 20, 2019
5	E-mail dated March 21, 2019 and April 25, 2019
6	Initial Evaluation Form for Jordan Eck dated 2/22/19, with attachments
7	Teacher Input Form, with attachments
8	Letter dated March 27, 2019, with attachments
9	E-mail chain starting March 24, 2019
10	Discipline Referral Form for Jordan Eck
11	Discipline Referral Form for Jordan Eck
12	Joint Report of Rule 26(f) Conference
13	Letter dated May 9, 2019
14	Prior Written Notice for Initial Evaluation and Request for Consent Form for Vincent Ferrizzi

1	<u>NUMBER</u>	<u>DESCRIPTION</u>
2		
3	15	Newsies Cast Members List
4	16	Memorandum dated March 21, 2019
5	17	Section 220, Student
6		Expression/Distribution and Posting of
		Materials
7	18	Section 233, Suspension and Expulsion
8	19	Section 248, Unlawful Harassment
9	20	Section 252, Bullying and Cyber Bullying
10	21	May 19, 2019 Required Information
11	22	E-mail dated March 19, 2019
12	23	E-mail dated March 20, 2019
13	24	E-mail dated March 20, 2019
14	25	E-mail dated March 21, 2019 with
15		handwritten notes
16	26	E-mail chain starting March 25, 2019
17	27	E-mail chain starting April 2, 2019
18	28	E-mail dated April 24, 2019
19	29	E-mail dated April 24, 2019
20	30	OVSD Code of Conduct
21	31	Text messages
22		
23		
24		
25		

1 PROCEEDINGS

2 LILY GLICK

3 was called as a witness and, having been first duly sworn
4 by the Reporter-Notary Public, was examined and testified
5 as follows:

6 BY MR. READY:

7 Q. Good afternoon.

8 A. Good afternoon.

9 Q. I'm Joel Ready and this is Sharon
10 O'Donnell.

11 A. Hi.

12 Q. I represent the Plaintiffs in this case,
13 Vinny Ferrizzi, Jordan Eck and Haley Hartline.

14 A. Okay.

15 Q. Ms. O'Donnell represents the Defendants,
16 the Oley Valley School District, Dr. Shank, Mr. Becker
17 and Mrs. Lyons. Because neither of us represents you, we
18 just want to make sure you understand a few things before
19 we get started here today.

20 A. Okay.

21 Q. You are entitled to read and sign your
22 testimony at the end of this. She's going to be taking
23 it down as we speak, and at the end of this, in a few
24 weeks, she will produce a transcript of everything you've
25 said today.

5

1 A. Okay.

2 Q. Do you want the opportunity to review
3 that and affirm that it's correct before it's given to
4 us?

5 A. Sure.

6 Q. If at any point you think you need legal
7 Counsel, you're allowed to stop these proceedings and let
8 us know and tell us that you want to call an attorney or
9 to cease these deposition. Okay?

10 A. Okay.

11 Q. I just want to make sure you understand
12 those things. Have you ever given testimony in Court
13 before?

14 A. No.

15 Q. You've never been in a deposition before?

16 A. No.

17 Q. Most people don't get to do it this
18 early, so congratulations. The purpose of today's
19 testimony is to establish some facts that are relevant to
20 the lawsuit that we're engaged in.

21 A. Okay.

22 Q. So I'm going to lay a couple ground rules
23 that I think will be pretty basic. Unlike in ordinary
24 conversation where people often talk over each other
25 because she has to take everything down, I'm going to ask

6

1 you to let me finish questions and Ms. O'Donnell to

2 finish questions before you start talking.

3 A. For sure.

4 Q. And vice versa, we'll try to let you
5 finish your question [sic] before we jump in.

6 A. Okay.

7 Q. If at any point you don't understand a
8 question, feel free to let us know and we'll try to
9 rephrase it or explain it.

10 A. All right.

11 Q. If you don't know something, then you can
12 say I don't know.

13 A. All right.

14 Q. Neither of us is asking you to know
15 everything or to speculate about anything you don't know.

16 A. Okay.

17 MR. READY: Anything I've missed, Ms.
18 O'Donnell?

19 BY MS. O'DONNELL:

20 Q. You just have to make sure that you keep
21 your answers audible and verbal and to words that can be
22 spelled. So if you're going to use a gesture like
23 nodding your head or shaking your head, you have to try
24 to remember to say yes or no, or if you want to use a
25 verbal gesture like um-hum or uh-uh, you have to try to

7

1 avoid that, too, because, again, it can't be spelled and
2 the Court Reporter isn't responsible to translate what
3 you mean by what you say. She may, however, encourage
4 you to respond verbally. So she may ask you, if you're
5 nodding your head, is that a yes, or if you say um-hum,
6 she'll ask you if that's a yes, and then you just respond
7 to what she's asking you. Okay?

8 A. Okay.

9 Q. If at any point during your deposition,
10 which should not be very long, you need to take a break,
11 you can take a break for any reason, just tell us and
12 we'll go off the record and give you some time to do
13 whatever you need to do.

14 Is there any reason today that you think you
15 might not be able to understand our questions completely and
16 give us truthful answers?

17 A. I think I should be okay.

18 BY MR. READY:

19 Q. And the only other thing I would add is
20 -- no, I think you've covered it. I'm sorry. Okay.
21 You're ready to go?

22 A. I'm good.

23 Q. State your name for the record for us.

24 A. I'm Lily Glick.

25 Q. And you're a student at Oley Valley

8

1 School District?
 2 A. Yes.
 3 Q. What year are you here?
 4 A. I'm a Junior, so 11th grade.
 5 Q. Have you gone to the Oley Valley School
 6 District your whole life?
 7 A. Since first grade.
 8 Q. That's pretty much your whole life;
 9 right?
 10 A. Yeah.
 11 Q. Do you know Jordan Eck?
 12 A. Yes.
 13 Q. Describe your relationship with Jordan.
 14 A. We started out as friends through the
 15 Drama Department in middle school. And then it
 16 progressed with high school becoming friends outside of
 17 just Drama Department with my sister being friends with
 18 him and just like kinda being part of that friend group,
 19 and we just became closer as the years went on.
 20 Q. Is your sister Jordan's age?
 21 A. She's a year older.
 22 Q. Do you know Jared Mazelka?
 23 A. Yes.
 24 Q. How do you know Jared?
 25 A. Also through the Drama Department. We

9

1 started -- we did our first musical in middle school.
 2 That's where we started, and we just were also friends
 3 throughout middle school for me and then high school for
 4 him.
 5 Q. How about Haley Hartline, do you know
 6 her?
 7 A. Yes. That was a little -- we're not as
 8 close as I was like with the two boys just because I
 9 didn't really get to know her until her Senior year,
 10 which was last year. So that was when we started talking
 11 more just through, again, Drama Department.
 12 Q. And finally, do you know Vinny Ferrizzi?
 13 A. Yes. He came to Oley -- he was there my
 14 Freshman year so that's when we -- he, again, was part of
 15 that friend group that I joined when my sister was a
 16 Senior. So I just was part of that.
 17 Q. Of those four people that I just named,
 18 would you say that you're closer to some than others and
 19 if so, who?
 20 A. Yea, probably Jordan the most. The
 21 other three I am close. It's like Jordan, Vinny, those
 22 two I'm closest with, but then I'm still relatively close
 23 with the rest of them.
 24 Q. Are there any of those people that you
 25 would say you -- the term frenemies was used earlier, but

10

1 are there any of those people that you say you're not
 2 friends with or you have problems or difficulties with?
 3 A. Not really.
 4 Q. Were you a part of the Drama Club last
 5 year?
 6 A. Yes.
 7 Q. Did you hold a position with the club?
 8 A. No. I was just a member of the cast.
 9 Q. Which show were you in?
 10 A. It was Newsies. I didn't do the play.
 11 Q. So you didn't do the fall play; you were
 12 in the musical in the spring?
 13 A. Yes.
 14 Q. I want to turn your attention to an event
 15 that happened on March 20th, 2019, so that was earlier
 16 this year.
 17 A. Okay.
 18 Q. There was a School Board meeting that
 19 occurred in which a number of students spoke about the
 20 Drama Club. Do you remember that School Board meeting?
 21 A. Yes.
 22 Q. Did you go to that School Board meeting?
 23 A. No.
 24 Q. How did you first hear about that School
 25 Board meeting?

11

1 A. Through students at school talking about
 2 the e-mail that their parents received about the School
 3 Board meeting. And then my mom had texted me and asked
 4 what was happening. And I responded with there was a
 5 School Board meeting, people were going to talk about the
 6 Drama Department.
 7 Q. What friend told you about the e-mail
 8 they received?
 9 A. Other cast members.
 10 Q. What did they say about the e-mail?
 11 A. That their parents got it, and they
 12 asked if I knew anything about it, and that's when I
 13 found out.
 14 Q. What did you hear about the e-mail?
 15 A. Just asking to go support the Drama
 16 Department, that there was people who did not approve of
 17 the stuff that was happening.
 18 Q. Did you hear about who did not approve of
 19 what was happening?
 20 A. I knew the students, but I did not know
 21 -- like it wasn't stated in the e-mail or -- that they
 22 said directly who it was.
 23 Q. Did you ever see this e-mail?
 24 A. I did.
 25 Q. Who showed you the e-mail?

12

1 A. Another student.
 2 Q. Who showed it to you?
 3 A. Cassidy Kauffman.
 4 Q. How did she get a hold of it? Do you
 5 know?
 6 A. Another student had sent it to her. I
 7 don't remember who the other one was, though.
 8 Q. Do you know of anybody else who had the
 9 e-mail or had read the e-mail?
 10 A. Another parent that had asked my mom
 11 about the e-mail. Katherine Wagner had sent it to my mom
 12 asking if she knew anything about it, 'cause my mom did
 13 not receive it.
 14 Q. So your mom was not one of the original
 15 recipients?
 16 A. Yes.
 17 Q. I'm going to slide this binder over to
 18 you (indicating). There are a lot of tabs in here, but
 19 don't worry, you won't have to look at all of them. I'm
 20 going to ask you to look behind Tab 4.
 21 A. (Witness complies.)
 22 Q. Do you know if this is the e-mail that
 23 you saw?
 24 A. (Witness reviewed document.)
 25 Q. You can certainly take a minute and read

13

1 it.
 2 A. (Witness reviewed document.)
 3 Yes, this is the e-mail.
 4 Q. So you saw it that day, on March
 5 the 20th. Is that right?
 6 A. Yes.
 7 Q. What were students saying about this
 8 e-mail?
 9 A. The majority of them were confused on --
 10 'cause they -- a lot of people did not understand the
 11 level of which things were going. They knew there was
 12 some confliction between the -- like the cast members,
 13 but they weren't aware of that it had got to a point of
 14 this.
 15 Q. You mentioned conflict between the cast
 16 members.
 17 A. Yes.
 18 Q. Who was that between?
 19 A. Just a bunch of them for the lead role
 20 of the musical. They had -- different people were on
 21 different sides of who should have gotten it. I know the
 22 two boys were not as involved as much as the other people
 23 had their opinions on who should have gotten it.
 24 Q. So the lead role is Jack in Newsies?
 25 A. Yes.

14

1 Q. So what was the conflict over as to who
 2 should have gotten the role?
 3 A. Who in that case was better or who
 4 should have deserved it more?
 5 Q. Yes.
 6 A. That some people were saying that Jordan
 7 could have gotten -- done better; some people were saying
 8 that Jared deserved it, that he -- and so like some
 9 people also were claiming favoritism.
 10 Q. What kind of favoritism?
 11 A. Mrs. Lyons favored Jared over Jordan.
 12 Q. And that was they were saying it was
 13 personal, I guess?
 14 A. Yes.
 15 Q. Did they say why they thought that?
 16 A. No.
 17 Q. Were there other individuals that groups
 18 of students thought should have gotten this role of Jack?
 19 A. No, just the two boys were the main
 20 issue.
 21 Q. You said a second ago when students got
 22 this e-mail, that they didn't realize, I guess, it was at
 23 this level is how you put it.
 24 A. Yes.
 25 Q. What did people say that gave you that

15

1 impression?
 2 A. The e-mail was like taking it to the
 3 School Board. And they knew that there was an issue
 4 between some of the characters 'cause we had a meeting
 5 before that. We were supposed to have a read through,
 6 and we didn't have it 'cause we had issues within the
 7 school day of students arguing and stuff.
 8 So they hadn't realized it had gotten to a
 9 point where we had to talk to the School Board about the
 10 issue at hand.
 11 Q. There's a sentence here that says -- I'm
 12 going to just point your direction (indicating). It
 13 starts with. Unfortunately, the situation. Do you see
 14 that sentence?
 15 A. Yes.
 16 Q. Unfortunately, the situation has
 17 escalated to the point that this student posted something
 18 against another student and the police were called in.
 19 Did students say anything about that
 20 statement that you heard?
 21 A. I did not hear anything that that had
 22 anything to do with the post.
 23 Q. It goes on to say: This mother and her
 24 son want me fired, and in the mother's words, she is
 25 going to destroy me, all of this because her son was not

16

1 cast as Jack.
 2 Who did you understand this e-mail to be
 3 about?
 4 A. Jared -- I mean Jordan and his mother.
 5 Sorry.
 6 Q. Was there any other opinion amongst the
 7 students as to who this was about?
 8 A. No. I think the majority of them knew
 9 that it was Jordan.
 10 Q. So Jordan and Mrs. Eck are not named in
 11 here, so how did people come to that conclusion?
 12 A. Since Jared got the part of Jack, they
 13 knew that the other part of -- the other person who would
 14 have gotten Jack was Jordan, so that was the issue.
 15 Q. A second ago you said -- and maybe I
 16 misunderstood, so I'm just going to ask to clarify. You
 17 said it wasn't as much between the two boys as other
 18 people. Are you saying the conflict wasn't as much
 19 between Jordan and Jared as between other people, or did
 20 I misunderstand you?
 21 A. The other people took the situation into
 22 a bigger deal than the two boys had taken it.
 23 Q. So it was your impression that Jordan and
 24 Jared weren't as upset about it as other people were?
 25 A. I knew that they were, but I knew the

17

1 other people were more upset.
 2 Q. You know sort of both of these people.
 3 Do you know anything about their relationship at that
 4 time, how it was fairing?
 5 A. I knew in the beginning of the year they
 6 were still -- we had the three triplets. It was Jared,
 7 Jordan and Vinny, they were all like the blond trifectas,
 8 is what they called themselves. So that's what people
 9 knew them as. So then I wasn't aware of their conflict
 10 -- I don't know -- their issue with each other.
 11 Q. Did either of them ever talk to you about
 12 it?
 13 A. No.
 14 Q. There's a statement at the end of this,
 15 and I'll point you down to the second-to-the-last
 16 paragraph (indicating).
 17 Dr. Shank -- first of all, she's in the
 18 room. Do you know who Dr. Shank is?
 19 A. Yes.
 20 Q. And you did at this time; right?
 21 A. Yes.
 22 Q. I guess everybody knows who the
 23 Superintendent is.
 24 A. Yes.
 25 Q. Dr. Shank let me know today that this

18

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1 parent is planning on attending the School Board meeting
 2 tomorrow night at 7:00 p.m. in the high school library.
 3 A. Yes.
 4 Q. Is that how you first learned about the
 5 School Board meeting?
 6 A. Yes.
 7 Q. I assume School Board meetings aren't on
 8 your regular calendar?
 9 A. No.
 10 Q. It's says: I'm reaching out to ask any
 11 and all parents that believe in this program and students
 12 that love it to please show up to the Board meeting to
 13 show your support.
 14 Do you remember reading that sentence?
 15 A. Yes.
 16 Q. What did you understand that sentence to
 17 be saying to you, if anything?
 18 A. That it was more about the program than
 19 the problem that we had thought it was about. So I
 20 thought at first I knew that the two boys had --
 21 everybody was -- I don't know, I wouldn't say -- they
 22 were upset about the issue. And then I thought it was
 23 more about the characters than the actual program being
 24 in jeopardy.
 25 Q. So you hadn't heard anything before this

19

1 time that the program itself was in jeopardy of being
 2 suspended or stopped?
 3 A. Right. I didn't know that the program
 4 had an issue, like the actual program was in a problem.
 5 Q. Did other students know that? From your
 6 conversations -- and I'm purely asking you about anything
 7 you interacted about. So from your conversations, did
 8 other students seem to know that?
 9 A. No.
 10 Q. They didn't know the program was in
 11 jeopardy?
 12 A. No.
 13 Q. Did you consider showing up at the Board
 14 meeting in response to this e-mail?
 15 A. No.
 16 Q. Why not?
 17 A. I didn't at this point want to get
 18 involved. I just wanted to be part of the musical and
 19 kinda stay out of the situation.
 20 Q. You wanted to be in the drama program,
 21 but not in the drama; right?
 22 A. Right.
 23 Q. And the other students, do you know if
 24 other students considered going in response to this
 25 e-mail?

20

8 of 20 sheets

1 A. My close friends had also -- did not
2 want to be part of it 'cause we were friends with both
3 the boys at the time, so we didn't want to have to -- at
4 that point it was choosing sides was the issue, and so we
5 both, me and my best friend, just stayed back, and we
6 just didn't go to the Board meeting.

7 Q. So students talked about whether or not
8 they wanted to go to the meeting?

9 A. Yes.

10 Q. Did they consider this as an invitation
11 to come to the meeting?

12 A. Yes.

13 Q. Are you still in drama?

14 A. No.

15 Q. Why not?

16 A. I decided to do cheerleading this year.
17 Previous years it was too much to have to split time with
18 games and practice, so I decided since I'm Captain of the
19 cheer team, that I would just stay with that one.

20 Q. Do you consider yourself a supporter of
21 the drama program?

22 A. Yes.

23 Q. Were you at this time a supporter of the
24 drama program?

25 A. Yes.

21

1 Q. Did anybody ever approach you with
2 concerns that you were not a sufficient supporter of the
3 program?

4 A. No.

5 Q. So the Board meeting, I understand, took
6 place on March 20th during a regularly scheduled
7 rehearsal.

8 A. Yes.

9 Q. Do you remember showing up for rehearsal
10 that night?

11 A. Yes.

12 Q. Can you describe for me what happened at
13 that rehearsal?

14 A. We were put into full lockdown after the
15 students had left to go to the Board meeting, so all the
16 doors were locked. Nobody could get in, nobody was
17 allowed to go out. If we had to use the bathroom, you
18 had to have an adult walk you from the door to the
19 bathroom and then from the bathroom to the door. It was
20 just like we had to stay within the auditorium.

21 Q. This might sound like a silly question,
22 how did you know you were on lockdown?

23 A. Mrs. Lyons said that we were in
24 lockdown.

25 Q. Did she say why?

22

1 A. She -- no, I don't believe so.

2 Q. She didn't give you any hints; she just
3 said we're on lockdown?

4 A. Right.

5 Q. Did some students leave from rehearsal to
6 go to the School Board meeting?

7 A. Yes.

8 Q. Do you remember what preceded that? Did
9 they ask to go, or what happened?

10 A. We walked in, we all sat down like we
11 normally did. She said that there was a Board meeting
12 and if anybody wanted to go speak up about the Drama
13 Department, they were allowed to go.

14 Q. Did she encourage you to go, or did she
15 just make that announcement?

16 A. She just made the announcement and said
17 it was up to us to decide what we wanted to do.

18 Q. After the School Board meeting, some
19 people came back from the School Board meeting; right?

20 A. Right.

21 Q. Do you remember when students kind of
22 came back in?

23 A. Like the time? I don't remember the
24 time or like --

25 Q. That's fine. You don't remember when

23

1 they came back?

2 A. Right.

3 Q. You guys had been rehearsing the whole
4 time?

5 A. Right.

6 Q. So some students came back. I understand
7 there was a conversation that happened after that about
8 kind of what had happened at the School Board meeting.

9 A. Yes.

10 Q. How did that begin?

11 A. We were told that -- they were told if
12 they wanted to share what happened or what was said at
13 the School Board meeting, they were allowed to. So we
14 just sat down on the stage and if you wanted to talk, you
15 were allowed to stand up and talk about what happened.

16 Q. You said they. Who is they?

17 A. The students who had left the auditorium
18 to go to the meeting.

19 Q. Who invited them to stand up and share?

20 A. Mrs. Lyons.

21 Q. Was Mrs. Lyons present for the rest of
22 this discussion, or did she leave?

23 A. She was present.

24 Q. When you say she was present, do you
25 remember, first of all, where the students were

24

1 assembled?

2 A. On the stage.

3 Q. Where was Mrs. Lyons?

4 A. Right down off the stage, so like in the
5 -- what we call the pit.

6 Q. Where was Ms. Hartenstine?

7 A. Right next to Mrs. Lyons.

8 Q. Were they listening? Did they

9 participate in the discussion at all?

10 A. They were listening. They didn't
11 participate all that often. They would just offer that
12 the floor was open.

13 Q. Do you remember anything about what the
14 students said during that discussion?

15 A. Just that our family, which is what the
16 cast was, was falling apart, and that there was people
17 who weren't as involved in the family as they used to be.

18 Q. At any point, did you notice either of
19 the teachers, Ms. Hartenstine or Mrs. Lyons, voice any
20 agreement or disagreement with anything that was said?

21 A. Mrs. Hartenstine did hit the stage when
22 there was one comment made as in like a yes moment.

23 Q. A yes moment, so like she was agreeing?

24 A. Yes.

25 Q. What was that comment? Do you recall?

25

1 A. I don't recall the exact -- what was
2 said.

3 Q. Do you remember any comments being made
4 about Jordan, Haley or Vinny in that discussion?

5 A. There was one student who said that
6 there was mental issues among those three students.

7 Q. And did Mrs. Lyons or Ms. Hartenstine say
8 anything about that?

9 A. No.

10 Q. What was your role in Newsies?

11 A. I was just a Newsie boy. I didn't have
12 like a specific part. I was just an ensemble member.

13 Q. Do you know during the musical
14 preparation who the understudy for the character Jack
15 was?

16 A. In the beginning it was Jordan. And
17 then after the School Board meeting, there was no
18 understudy that I'm aware of.

19 Q. Was it common knowledge as to who the
20 understudies were?

21 A. Yes. They are posted when the cast list
22 is posted. There is an understudy line.

23 Q. Did you notice -- you were at every
24 rehearsal; correct?

25 A. Yes.

26

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1 Q. I know that sometimes you break down into
2 different groups; right?

3 A. Yes.

4 Q. A lot of times you also rehearse all
5 together?

6 A. Yes.

7 Q. Did it seem to you that any of the four
8 people I've just named were not trying very hard or were
9 not rehearsing like they really cared about it?

10 A. No. They were all there and present, as
11 most of us were.

12 Q. Did you ever hear anybody complaining
13 that one of those four people wasn't really trying very
14 hard?

15 A. No.

16 Q. Did anybody ever complain that any of
17 those four individuals was always forgetting lines or
18 performing poorly?

19 A. No.

20 Q. Did you ever notice that?

21 A. No. They were all very theatrically
22 good people. They were good with their music, good with
23 their lines.

24 Q. So you were on lockdown. Do you remember
25 when lockdown was -- I don't know if the term is lifted.

27

1 Do you remember when it was no longer in lockdown?

2 A. I don't. I'm sorry.

3 Q. Did you observe Jordan and Jared interact
4 with each other that night after the School Board
5 meeting?

6 A. No.

7 Q. Do you recall about when you left
8 rehearsal that night?

9 A. Rehearsals normally ended around 9, I do
10 believe, so it was somewhere after that I had left.

11 Q. You were not witness to a conversation
12 between Jordan and Mrs. Lyons and any other individuals
13 after rehearsal, were you?

14 A. No.

15 Q. I'm going to take you to the following
16 day. How did you hear, if at all -- did you hear that
17 Jordan was suspended?

18 A. Not that day.

19 Q. When did you hear about it?

20 A. I do believe it was the next day when I
21 had noticed he didn't show -- or wasn't at school the
22 past two days or day or something. And I had asked a
23 friend, and she was unaware of what had happened, too.

24 Q. Were you there when Dr. Shank and Mr.
25 Becker addressed the Drama Club?

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10 of 20 sheets

1 A. Yes.
 2 Q. What do you remember about that day?
 3 A. We -- I was in chorus when they had an
 4 announcement that any Drama Club member, either cast,
 5 crew, was to come down to the auditorium for a meeting.
 6 And then we had a meeting over if you had an issue with
 7 the department, you were allowed to leave the program and
 8 that was your decision, and if you wanted to stay, you
 9 had to support.
 10 Q. You had to support what or who?
 11 A. Just the program and not bring it down.
 12 Q. When it was said if you have an issue, do
 13 you know what that's a reference to or what issues were
 14 being talked about?
 15 A. Continuation of the School Board meeting
 16 if you had -- sorry -- if you had -- if you weren't there
 17 to support your other cast members or your other -- or
 18 the program itself, then you were -- you didn't have to
 19 stay.
 20 Q. Do you remember Haley being there that
 21 day?
 22 A. Yes.
 23 Q. What was her demeanor like?
 24 A. She seemed on edge for most of the
 25 meeting until the end when she gathered her stuff and

29

1 then she left.
 2 Q. Do you remember what she said as she
 3 left?
 4 A. I don't recall exactly the words.
 5 Q. You said this was toward the end. Was
 6 this at the end of the meeting, or was this before the
 7 end?
 8 A. It was slightly before the end. The
 9 meeting didn't go on much longer after she had left.
 10 Q. Do you remember her disrupting the
 11 meeting at any time?
 12 A. Not until Dr. Shank had asked if anybody
 13 would like to leave, you can, and she got her stuff. And
 14 then Dr. Shank asked if she wanted to leave, and she said
 15 yes, and she got up and left and threw her script into
 16 the trash can.
 17 Q. After the show was done, you had a cast
 18 and crew party. Do you remember that?
 19 A. Yes.
 20 Q. Tell me what happened at that cast and
 21 crew party. What does an after-party look like for a
 22 drama program?
 23 A. We have pizza. We hang out. We're
 24 given our goodie bags that family and friends are allowed
 25 to put like treats in. And Mrs. Lyons invites us up on

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1 stage, she says a few words about us, Seniors, talk about
 2 them leaving and what their post high school plans are
 3 and stuff that they loved about the program.
 4 Q. So each of the Seniors gets to give a
 5 speech to everybody?
 6 A. Yes.
 7 Q. Is everybody gathered for that speech?
 8 A. Yeah.
 9 Q. So there's not like people who've left or
 10 who are off on the side?
 11 A. No. We're all at tables, sitting and
 12 eating pizza and listening.
 13 Q. Do you remember Jared's speech?
 14 A. Parts of it.
 15 Q. Tell me about what you remember from what
 16 he said.
 17 A. It started out with him saying how much
 18 he loved the program, and then it progressed into people
 19 who had attacked the program. And then when Vinny got
 20 up, partially -- part of the way through he said bitches
 21 shall be bitches towards the people who had attacked Mrs.
 22 Lyons, in his words.
 23 Q. How did you understand that that was
 24 about the people who had been against Mrs. Lyons?
 25 A. There was a moment of silence as soon as

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1 Vinny got up. Jared looked offended, and then that's
 2 when he said that.
 3 Q. Mrs. Lyons and Ms. Hartenstine, were they
 4 present during this?
 5 A. Yes.
 6 Q. Were they listening?
 7 A. Yes.
 8 Q. Cassidy Kauffman is Vinny's girlfriend;
 9 right?
 10 A. Yes.
 11 Q. What was her reaction to all of this?
 12 A. She was having a panic attack, so she
 13 was crying, shaking. Towards the end of Jared's speech,
 14 Cassidy and I had gone outside so she could breathe and
 15 not have to -- she was in a panic attack, so we had to
 16 step outside to get some air.
 17 Q. And so you went out with her?
 18 A. Yes.
 19 Q. Did any adults come with you at that
 20 point?
 21 A. No.
 22 Q. Mrs. Lyons didn't accompany you?
 23 A. No.
 24 Q. Did Mrs. Lyons speak to Cassidy before
 25 she left?

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1 A. Before we went outside?
 2 Q. Yes.
 3 A. No.
 4 Q. Did either Mrs. Lyons or Ms. Hartenstine
 5 stop or correct Jared's speech?
 6 A. No.
 7 Q. Approximately how many students are at
 8 this after-party?
 9 A. I wanna say maybe 40. It was a larger
 10 cast, and then you have crew, as well.
 11 Q. Do you remember Mrs. Lyons handing out
 12 happy papers?
 13 A. Yes.
 14 Q. I understand this is a tradition.
 15 A. Yeah.
 16 Q. Describe happy papers, briefly.
 17 A. So each cast member has a happy paper
 18 with their name on it, and then the cast -- other cast
 19 members write on your paper something towards you that
 20 they'll always remember or if you're a Senior, you write
 21 something sentimental with that person or just positivity
 22 towards each other.
 23 Q. How are these distributed?
 24 A. Mrs. Lyons hands them out with your
 25 goodie bag, and she talks about you a little bit when she

33

1 gives you the bag.
 2 Q. She hands this out to everybody?
 3 A. Yes.
 4 Q. And, I guess, is this in front of
 5 everyone, too?
 6 A. Yes.
 7 Q. Do you remember her handing Vinny his
 8 goodie bag?
 9 A. Yes.
 10 Q. What happened?
 11 A. He was called up on stage. She said
 12 that he did a really good job with his part, but then she
 13 was offended -- or she would never forgive him for the
 14 things that he had said about her this past musical
 15 season.
 16 Q. Was it more specific than that, or is
 17 that all she said?
 18 A. It was -- I'm not entirely sure. I
 19 think that was the majority of it.
 20 Q. You don't remember her saying specific
 21 things that he said, just kind of generally I'll never
 22 forgive you for what you said?
 23 A. Right.
 24 Q. Circling back to Jared's speech for a
 25 second, do you remember any other comments that he made?

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1 A. There was a threat towards anybody who
 2 would come after Mrs. Lyons. He had said that he would
 3 -- I'm not entirely -- don't entirely remember what he
 4 had said, but it was like that if you would come after
 5 Mrs. Lyons, he would attack -- not attack -- go after you
 6 in a way because you came after Mrs. Lyons.
 7 Q. What did you understand him to mean by go
 8 after?
 9 A. Try to destroy her or put her down in a
 10 way.
 11 Q. What did you understand him to mean when
 12 he said, you know, if that happens, I'll go after you?
 13 A. That he would make sure you felt bad
 14 enough for doing what you did to Mrs. Lyons.
 15 Q. How long have you known Jared again? I'm
 16 sorry.
 17 A. I was in 5th grade, so about five years.
 18 Q. Were you aware that he had allergies?
 19 A. No.
 20 Q. Did Mrs. Lyons, Ms. Hartenstine, Mr.
 21 Becker or Dr. Shank ever have conversations with you
 22 about that speech that Jared gave?
 23 A. No.
 24 Q. Were you there at set strike the
 25 following day?

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1 A. Yes.
 2 Q. I guess it was the same day?
 3 A. Yes.
 4 Q. I keep thinking it's the following day.
 5 After you left, you came back; right?
 6 A. Yes.
 7 Q. Do you remember when Vinny arrived?
 8 A. Yes.
 9 Q. What happened?
 10 A. We had been cleaning up, doing small
 11 things around the music area because it was back rooms
 12 and the entire auditorium we cleaned. At one point we
 13 were held back in hallways. We weren't entirely sure
 14 why. We were just told to stop. Ms. Mazeika had asked
 15 us to stop back behind a hallway so we weren't allowed in
 16 the main hallway. And then we were dismissed from being
 17 held back there.
 18 I was then asked to go get my stuff from
 19 Vinny's car because I had spent the night at Vinny's house
 20 with a few other friends. And so on our way out, Vinny,
 21 Mrs. Lyons and three other men were out there talking, and I
 22 went out to get my stuff from Vinny's car.
 23 Then Vinny came out and he was crying,
 24 Cassidy had stayed with him. I had taken all the stuff back
 25 into the school at that point.

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1 Q. Did you speak to Vinny or Cassidy?
 2 A. I did speak to Cassidy. We were walking
 3 out. Cassidy was crying because she felt nervous for
 4 everybody in that moment. I didn't talk to Vinny just
 5 'cause he was crying, and I just wanted to get out of the
 6 way. So I just took my stuff and went back in.
 7 Q. Who were the three parents -- I think you
 8 said parents -- or the three people you saw, the adults?
 9 A. It was Mr. Lyons, Mr. Ush and
 10 Danielle's dad. I don't remember his last name.
 11 Q. Are these people who are normally at
 12 rehearsal?
 13 A. No. They're not -- they're the fathers
 14 of the children, but they don't normally stay at
 15 rehearsals.
 16 Q. So you knew who they were?
 17 A. Yes.
 18 Q. The night before, during the show -- in
 19 fact, I'll go further back. From the set strike
 20 backwards, do you remember Vinny going around talking
 21 about a lawsuit?
 22 A. No.
 23 Q. Have you ever known Vinny to be violent?
 24 A. No.
 25 Q. What is Vinny like?

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1 A. I would say he's like a little kid at
 2 heart. I wouldn't expect him to be violent. I normally
 3 would expect him to be a happy, energetic person.
 4 Q. You say expect him to be, you mean that's
 5 how you know him to be or --
 6 A. Yes.
 7 Q. -- do you mean -- go ahead.
 8 A. I'm sorry. Yeah, that's how I know him
 9 to be.
 10 Q. I'm going to show you a video. It's very
 11 brief. I will represent to you that this is a video from
 12 Snapchat. Okay?
 13 A. Okay.
 14 (Video shown.)
 15 Q. What do you understand to be happening in
 16 that video?
 17 A. Is he flirting with a girl over a
 18 Snapchat video? I --
 19 Q. Would you understand anything in that
 20 video to be a threat toward you or anyone else?
 21 MS. O'DONNELL: I object to the form, but
 22 you can answer.
 23 THE WITNESS: No.
 24 BY MR. READY:
 25 Q. Did you hear any conversations about why

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1 Jordan was suspended amongst other students?
 2 A. There was conversation he was suspended
 3 for speaking out against stuff at the School Board
 4 meeting, but that was about all I heard.
 5 Q. When did you learn -- let me ask. Did
 6 you hear that Haley was suspended at some point?
 7 A. No. I was unaware.
 8 Q. Did you hear why Vinny was asked to leave
 9 the set strike?
 10 A. I heard that he was posing a threat --
 11 or not -- he was -- people were uneasy by his presence
 12 of being there.
 13 Q. Do you know who was uneasy?
 14 A. No.
 15 Q. And do you know, who did you hear that
 16 from?
 17 A. Other students that were talking.
 18 Q. Do you remember who offhand?
 19 A. No. I'm sorry.
 20 Q. I know this happened many months ago now.
 21 A. Yes.
 22 Q. Do you remember if it was a few students,
 23 a lot of students?
 24 A. A few.
 25 Q. And after Vinny -- first of all, do you

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1 remember when Vinny arrived?
 2 A. No.
 3 Q. You mentioned that you were all held back
 4 in a hallway?
 5 A. Yes.
 6 Q. When was that?
 7 A. Towards the beginning of set strike, so
 8 it was early in the morning. It was like maybe 20
 9 minutes after we had gotten there.
 10 Q. Set strike started at 10, I'll represent
 11 to you. So would that have been about 10:20 you think?
 12 A. Yes.
 13 Q. So you had been there since 10 o'clock?
 14 A. Yes.
 15 Q. And then about 10:20 were you gathered
 16 into a hallway, or how did that happen?
 17 A. It was just wherever we were at the
 18 time, we were told to stay where we were.
 19 Q. What happened after Vinny left, what
 20 happened at set strike? What does that consist of for
 21 the rest of the day?
 22 A. Just more packing up costumes, making
 23 sure that we cleaned every room that we were in. I had
 24 actually taken a nap by accident.
 25 Q. We appreciate your honesty.

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1 MS. O'DONNELL: So she doesn't know.
 2 THE WITNESS: Well, I was awake for most of
 3 it, but....
 4 BY MR. READY:
 5 Q. I guess everyone is tired at the end of
 6 the long show, right?
 7 A. Yes.
 8 MR. READY: Give me one second here.
 9 (Short pause.)
 10 MR. READY: I have no further questions.
 11 BY MS. O'DONNELL:
 12 Q. I just have a couple of follow-ups, Lily.
 13 Do you know whether there were students who spoke up at
 14 the Board meeting? Do you know for a fact that there
 15 were some students who spoke?
 16 A. Yes.
 17 Q. Who do you know spoke?
 18 A. It was -- I do believe Asa Lackey spoke.
 19 DR. SHANK: A-S-A, L-A-C-K-E-Y. Asa is the
 20 first name. Lackey is the last name.
 21 BY MS. O'DONNELL:
 22 Q. Asa Lackey.
 23 A. I can't recall any specific people. I
 24 just know what they had come back with was....
 25 Q. Do you know whether Jordan spoke at the

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1 Board meeting?
 2 A. I do believe he did.
 3 Q. Why do you believe that?
 4 A. 'Cause they had talked about what was
 5 being said. I know you only had a specific amount of
 6 time at the Board meeting to speak, but I knew that he
 7 spoke, I just don't remember when or --
 8 Q. And you know because these kids came back
 9 to rehearsal and talked about what was said?
 10 A. Yes.
 11 Q. If it wasn't for that discussion at
 12 rehearsal, would you know who spoke at the Board meeting?
 13 A. No.
 14 Q. And to the best of your recollection, it
 15 was Jordan and Asa?
 16 A. Yes.
 17 Q. Do you know whether there were others?
 18 A. I do believe so. I just don't remember
 19 who.
 20 Q. Other than Jordan, did you hear that
 21 anyone else was suspended?
 22 A. No.
 23 MS. O'DONNELL: Those are all the questions
 24 I have. Thank you.
 25 (Whereupon, the deposition concluded at 1:40

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o'clock p.m.)

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CERTIFICATE

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3 I, Lori A. Dilks, the officer before whom
 4 the deposition of LILY GLICK was taken, do hereby certify
 5 that LILY GLICK, the witness whose testimony appears in
 6 the foregoing deposition, was duly sworn by me on
 7 November 14, 2019, and that the transcribed deposition of
 8 said witness is a true record of the testimony given by
 9 her; that the proceedings are herein recorded fully and
 10 accurately to the best of my ability; that I am neither
 11 attorney nor counsel for, nor related to any of the
 12 parties to the action in which this deposition was taken;
 13 and, further, that I am not a relative of any attorney or
 14 counsel employed by the parties hereto or financially
 15 interested in this action.

Lori Dilks

Lori A. Dilks

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PA Court Reporter
 Notary Public in and for the Commonwealth of Pennsylvania

My Commission expires
 November 29, 2023

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V		
VALLEY [1]		

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JORDAN ECK, HALEY
HARTLINE and VINCENT
FERRIZZI,

Plaintiffs

NO. 5:19-CV-01873-MAK

vs.

OLEY VALLEY SCHOOL
DISTRICT; TRACY SHANK,
individually and as
Superintendent of the
Oley Valley School
District; CHRISTOPHER M.
BECKER, individually and
as Principal of Oley
Valley High School; and
STACEY LYONS,
individually and as
employee of Oley Valley
High School,

Defendants

JURY TRIAL OF 12
DEMANDED

DEPONENT: HALEY RICHARD

DATE AND TIME: Thursday, November 14, 2019
at 1:45 p.m.

LOCATION: Oley Valley High School
17 Jefferson Street
Oley, Pennsylvania

BERKS COURT REPORTING SERVICE
By: Lori A. Dilks
Certified Court Reporter
10 Fox Glen Drive
Sinking Spring, Pennsylvania 19608
(610) 678-9984
berkscourtreporting@gmail.com

1

1 APPEARANCES:

2
3 CORNERSTONE LAW FIRM, LLC
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8 Representing the Plaintiffs

9
10 MARSHALL, DENNEHEY, WARNER, COLEMAN & GOGGIN
11 By: Sharon M. O'Donnell, Esquire
12 100 Corporate Center Drive
13 Suite 201
14 Camp Hill, PA 17011

15 Representing the Defendants

16
17 ALSO PRESENT:

18 Dr. Tracy Shank
19
20

21 STIPULATION: It has been stipulated by and between
22 counsel that they waive the sealing of the transcribed
23 testimony by the witness and the filing of the original
24 with the Court, and all objections, except as to form,
25 until the time of trial.

I N D E X

<u>WITNESS</u>	<u>EXAMINED BY</u>	<u>PAGE</u>
Haley Richard	Mr. Ready	5
	Ms. O'Donnell	7
	Mr. Ready	8
	Ms. O'Donnell	33

EXHIBITS

<u>NUMBER</u>	<u>DESCRIPTION</u>
1	Letter dated March 20, 2019
2	Marla Jones Narrative
3	Discipline Referral Form
4	E-mail dated March 20, 2019
5	E-mail dated March 21, 2019 and April 25, 2019
6	Initial Evaluation Form for Jordan Eck dated 2/22/19, with attachments
7	Teacher Input Form, with attachments
8	Letter dated March 27, 2019, with attachments
9	E-mail chain dated 3/24/19
10	Discipline Referral Form for Jordan Eck
11	Discipline Referral Form for Jordan Eck
12	Joint Report of Rule 26(f) Conference
13	Letter dated May 9, 2019
14	Prior Written Notice for Initial Evaluation and Request for Consent Form for Vincent Ferrizzi

1	15	Newsies Cast Members List
2	16	Memorandum dated March 21, 2019
3	17	Section 220, Student
4		Expression/Distribution and Posting of
5		Materials
6	18	Section 233, Suspension and Expulsion
7	19	Section 248, Unlawful Harassment
8	20	Section 252, Bullying and Cyber Bullying
9	21	May 19, 2019 Required Information
10	22	E-mail dated March 19, 2019
11	23	E-mail dated March 20, 2019
12	24	E-mail dated March 20, 2019
13	25	E-mail dated March 21, 2019 with
		handwritten notes
14	26	E-mail chain starting March 25, 2019
15	27	E-mail chain starting April 2, 2019
16	28	E-mail dated April 24, 2019
17	29	E-mail dated April 24, 2019
18	30	OVSD Code of Conduct
19	31	Text messages

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PROCEEDINGS

HALEY RICHARD

was called as a witness and, having been first duly sworn by the Reporter-Notary Public, was examined and testified as follows:

BY MR. READY:

Q. Good afternoon.

A. Good afternoon.

Q. I know we just met. My name is Joel

Ready. I represent the Plaintiffs in this case who are bringing a lawsuit, and those are Jordan Eck, Vinny Ferrizzi and Haley Hartline. Ms. O'Donnell represents the Defendants, Oley Valley School District, Dr. Shank, Mr. Becker and Mrs. Lyons.

Have you ever given testimony in Court before?

A. No.

Q. You've never been in a deposition before?

A. No.

Q. Well, you can scratch this off your bucket list and add it to your LinkedIn. I'm going to lay a couple ground rules. Lori is our Court Reporter today, so she's going to take down everything you say. Okay?

A. Okay.

5

Q. So for that reason, this is a going to be a little bit different than normal conversation would be. I'll ask you to let me finish statements before you jump in, and I'll try to respect that, as well.

A. Okay.

Q. And then I'll also ask you to verbalize all of your answers as yes or no rather than uh-huh or a nod of the head.

A. Okay.

Q. I know she'll want us to speak up and also try to speak slowly, which I struggle with all the time. If we think you're talking too fast, we'll try to remind you.

A. Okay.

Q. Are you under the influence of any medication or anything that would affect your ability to understand what we're doing today?

A. No.

Q. If I ask you a question or Ms. O'Donnell asks you a question that you don't understand, feel free to let us know and rephrase, but if you answer we'll just assume you understood it.

A. Okay.

Q. If at any point you want to take a break, that's fine. We'll just ask you to finish the question

6

you're on.

A. Okay.

Q. Finally, because Ms. O'Donnell and I do not represent you -- we represent other parties in this case -- you're here without an attorney. You understand that; right?

A. Yes.

Q. If at any point we ask you something or you feel the need to seek legal Counsel, you can stop this deposition and do so. Okay?

A. Yep.

Q. Do you have any questions before we get started?

A. No.

MR. READY: Did I miss anything?

MS. O'DONNELL: Yes.

MR. READY: Go ahead. She's done this longer than I have, so I will defer to wisdom.

BY MS. O'DONNELL:

Q. After this proceeding is over, it'll be transcribed into a booklet form. You have a right to review that booklet to make sure that the testimony that you give today is the testimony that you gave accurately. And then if there are any -- anything at all that you see in the transcript that doesn't reflect what you think you

7

said, you can change it.

A. Okay.

Q. Or you can waive that whole thing and you don't have to read it at all, but it's completely up to you. Would you just let us know whether you want to read it or waive it?

A. Okay. I'll read it.

Q. Would you give the Court Reporter, please, would you give Lori your address so that she knows where to send the transcript?

A. Yes. 119 Mud Run Road, M-U-D, Oley, PA, 19547.

BY MR. READY:

Q. Haley, do you know Jordan Eck?

A. Yes.

Q. How do you know Jordan?

A. He's my friend and he's a fellow student. We graduated the same year together, and I've known him almost my entire time in Oley Valley.

Q. You say Oley Valley. Does that go back before high school?

A. Yeah. That's elementary, middle school, high school.

Q. So you've been in the Oley Valley School since you started school?

8

1 A. Yep.
 2 Q. Do you know Haley Hartline?
 3 A. Yes.
 4 Q. How do you know Haley?
 5 A. She is also a friend of mine, and I've
 6 known her from school. She did leave Oley for a set of
 7 time, but I knew her before she left and when she came
 8 back.
 9 Q. Do you know Vinny Ferrizzi?
 10 A. Yes.
 11 Q. How do you know Vinny?
 12 A. He's also my friend, and he graduated
 13 with me --
 14 (Short pause.)
 15 THE WITNESS: So he's my friend,
 16 graduated the same year as me. He came here his Freshman
 17 year, so I've known him throughout high school.
 18 BY MR. READY:
 19 Q. Do you know Jared Mazeika?
 20 A. Yes.
 21 Q. How do you know Jared?
 22 A. He was my friend, but after all this
 23 started happening I didn't consider him my friend
 24 anymore, but I've known him since elementary school on,
 25 so....

9

1 Q. When you say all of this started
 2 happening, about when do you feel that your relationship
 3 with Jared changed?
 4 A. The last half of Senior year during the
 5 spring musical, specifically after an incident that
 6 occurred with him and Haley. He threw a binder right
 7 past her head -- it was this close (indicating) -- and
 8 that's when I seriously started considering trying to
 9 move away from talking to him 'cause that -- it just kind
 10 of came out of nowhere.
 11 Q. When you said this close, you held up
 12 your hand. How close? Could you describe that for the
 13 Court Reporter?
 14 A. It was about a few inches away from her
 15 head.
 16 Q. Did you witness this?
 17 A. Yes.
 18 Q. Did you speak to anyone about this
 19 incident?
 20 A. No. I was never called down to talk
 21 about it.
 22 Q. You didn't approach anyone to talk about
 23 it?
 24 A. No.
 25 Q. Where are you now in school?

10

Page 9 to 12 of 36

1 A. I am in Millersville University. I'm
 2 studying music education, and I'm a Freshman.
 3 Q. So you graduated in May or June of this
 4 year?
 5 A. June, yes.
 6 Q. Well, congratulations.
 7 A. Thank you.
 8 Q. You said you're doing music. Are you
 9 majoring in anything specific in music?
 10 A. Music education with a focus in vocal
 11 voice.
 12 Q. What role were you in the spring musical?
 13 A. I was Katherine's understudy, Hannah, a
 14 bowery beauty and a nun.
 15 Q. Bowery beauty and a nun?
 16 A. Yes.
 17 Q. All of that in the same musical?
 18 A. Yeah.
 19 Q. Were you part of the Drama Club, as well?
 20 A. Yes.
 21 Q. Were you part of the fall play?
 22 A. Yes.
 23 Q. Do you know Grace Bertin?
 24 A. Yes.
 25 Q. Who is she?

11

1 A. She is a fellow student of mine. She
 2 graduated the same year as me, and she was also involved
 3 with the Drama Department.
 4 Q. Was she also in the musical?
 5 A. Yes.
 6 Q. So was she also at most of the
 7 rehearsals?
 8 A. Yeah.
 9 Q. I want to ask you about March 20th, 2019.
 10 I don't necessarily expect you to remember that date off
 11 the top of your head. That day there was a Board meeting
 12 in which some students spoke about the Drama Club.
 13 A. Yes.
 14 Q. Do you remember this?
 15 A. Yes.
 16 Q. Did you attend that School Board meeting?
 17 A. I did not.
 18 Q. How did you first hear about it?
 19 A. I was actually told by Jordan, Haley and
 20 Vinny that they were going to go to this Board meeting to
 21 talk about some concerns with Stacy Lyons and about the
 22 way she was running things and treating people.
 23 I did not attend, but I did send a letter
 24 and Mrs. Eck, Jordan's mom, did read it to the School
 25 Board.

12

6 of 17 sheets

1 Q. What was in your letter?

2 A. I was also just voicing concerns because
3 I know Stacy Lyons has -- she definitely plays favorites,
4 that's one thing, and it's very obvious to people.

5 And Jordan -- Jordan did get a part and
6 he was fine with the part; that's not what the issue was.
7 He was more concerned because she was treating people
8 differently and --

9 Q. Let me stop you there for a second. Who
10 was she treating differently?

11 A. I could tell she was treating -- I know
12 she treated me differently, personally. She just treated
13 students who -- I don't want to say she disrespected them
14 'cause she didn't necessarily disrespect them but -- I'll
15 put it this way. If she hears something about you or she
16 doesn't like something that you did or said, she will
17 start treating you differently. And whether she's nice
18 to your face, she may not be nice back -- like to other
19 people when she's talking about you.

20 Q. When did she start treating you
21 differently, in your estimation?

22 A. My Junior year during our musical I --
23 there was a rumor spread about me and it had gotten back
24 to her, and the rumor was that I called someone too fat
25 for a role, which was very far off because she was my

13

1 best friend, and I don't call anyone fat. But I
2 personally feel like that was why I didn't get a chance
3 in the musical. And then it also --

4 Q. I'm sorry to interrupt.

5 A. That's okay.

6 Q. What do you mean, didn't get a chance in
7 the musical?

8 A. I had gotten a call back for a lead, but
9 I heard that the rumor was said to her at call-backs or
10 somewhere around that time, and when the cast list came
11 out I was --

12 (Short pause.)

13 MR. READY: I'm sorry, I forgot what you
14 were saying.

15 MS. O'DONNELL: She felt that Mrs. Lyons
16 didn't give her a chance.

17 THE WITNESS: The rumor was told during
18 call-backs. And after the cast list came out, I did not
19 receive an understudy role for the lead that I was trying
20 out for or the lead part, and I was just casted in the
21 ensemble.

22 And something similar to that happened my
23 Senior year. I did receive the understudy part, but I
24 could tell something was off.

25 BY MR. READY:

14

1 Q. Did you notice this -- you said she

2 played favorites. I assume you're not talking about just
3 with you. Did you observe this with others?

4 A. Yes. Jared Mazeika was definitely one
5 of her favorites, I guess you could say, and most of the
6 underclassmen were also closer to her.

7 Q. How could you tell that Jared was one of
8 her favorites?

9 A. He would always be receiving roles,
10 always talking to her, and his mom also helped her with
11 everything.

12 And it wasn't as noticeable like when we
13 first started the program our Freshman year, but as it
14 went on you could just tell she always favored him more
15 than others because he was always getting the roles he
16 wanted. He was always there extra. She always asked him
17 to help with stuff. It just was obvious to many people.

18 Q. When auditions for Newsies were held, do
19 you remember the competition for the role of Jack?

20 A. I do.

21 Q. Who tried out to be Jack?

22 A. Jared and Jordan.

23 Q. Did anybody else try out?

24 A. No.

25 Q. Was it well known that this was a

15

1 competition between the two of them?

2 A. Yeah. I mean, the cast had figured that
3 those two would go out for the role because they normally
4 go out for the same parts.

5 Q. So they had been competing against each
6 other for a while for parts?

7 A. Yeah.

8 Q. Was there a conflict between Jared and
9 Jordan after that role was selected?

10 A. There didn't seem to be any. They both
11 seemed to be fine with the roles that they received.
12 And, specifically, Jordan never had gone up to Jared and
13 said anything about not being able to get the role over
14 him, and he didn't seem terribly upset by it. He was
15 content with having the role he got.

16 Q. Did Jared confide in you as a friend,
17 generally?

18 A. Sometimes, yes. Certain things he, I
19 guess, wouldn't tell me, I guess, if it was about like my
20 other friends, like perhaps Jordan, Haley, Vinny.

21 But yeah, he definitely was a closer
22 friend at one point and definitely told me things.

23 Q. You mentioned this binder incident that
24 you felt changed the nature of your relationship.

25 A. Yes.

16

1 Q. Roughly when did that occur?
 2 A. I cannot remember exactly. I cannot
 3 recall.
 4 Q. Was it in the Spring of this year?
 5 A. Yes.
 6 Q. The night of the School Board meeting on
 7 March 20th, I understand there was a rehearsal going on
 8 at the same time.
 9 A. Yes.
 10 Q. Were you at that rehearsal?
 11 A. I was.
 12 Q. Do you remember what happened when you
 13 arrived?
 14 A. The whole cast got there except for
 15 Jordan, Haley, Vinny because they were already at the
 16 School Board meeting.
 17 And then Stacy Lyons had mentioned that
 18 we will be going under a lockdown while the School Board
 19 meeting was going on. I was kind of confused why, but
 20 she said that they have been asked to go under lockdown
 21 while the School Board meeting was happening.
 22 Q. Did she say who asked or why?
 23 A. No.
 24 Q. What does lockdown mean to you?
 25 A. All the doors were locked shut. We were

17

1 not allowed to go out in the hallways. And if we had to
 2 use the restroom that night, we had to ask Ms.
 3 Hartenstine and she would open the door and go out and
 4 wait in the hallway with us until we finished, and then
 5 she would take us back in and close the door again.
 6 Q. You had a fairly normal rehearsal, I
 7 guess, other than people being absent or no?
 8 A. Yeah, it was a fairly normal rehearsal.
 9 We were going over scenes and doing the normal -- a large
 10 group of students did go to the School Board meeting,
 11 though.
 12 Stacy had asked -- announced that if
 13 anyone would like to go and support the Drama Department
 14 that they were free to go. As soon as those students
 15 left, that's when the lockdown actually began.
 16 And so they were there for the School
 17 Board meeting and were allowed to speak. And when they
 18 came back the rehearsal stopped and Stacy had said that
 19 -- for everyone to go up on stage and for the students
 20 who did go, if they wanted to say what they saw, heard,
 21 felt, they were allowed to speak freely.
 22 Q. Was Ms. Hartenstine present for this?
 23 A. Yes.
 24 Q. Did Mrs. Lyons and Ms. Hartenstine stand
 25 on stage with you?

18

Page 17 to 20 of 36

1 A. They were right below the stage, but
 2 they were watching people get up and talk.
 3 Q. Did they hear what was said?
 4 A. Yes.
 5 Q. Did they comment on anything that was
 6 said?
 7 A. I don't recall them commenting. The
 8 students were allowed to speak freely and say what they
 9 wanted to.
 10 Q. Did they voice approval or disapproval of
 11 anything that was said?
 12 A. I don't recall them saying much of
 13 anything that night.
 14 Q. Do you remember any comments about Haley,
 15 Jordan and Vinny being made by any other students?
 16 A. I do not believe names were actually
 17 used, but you could tell students were very disappointed
 18 and upset that the three of them would go and do this
 19 'cause they felt -- I know most students -- because of
 20 what I heard and what I saw on social media -- most
 21 students believed that they did this because they didn't
 22 get the roles they wanted.
 23 So that's what they believed, for the
 24 most part.
 25 (Short pause.)

19

1 And they were clearly just upset by the
 2 fact that they went to the School Board meeting and tried
 3 to voice concerns.
 4 Q. Do you know why people thought that they
 5 were upset with their roles?
 6 A. Specifically, people pointed fingers at
 7 Jordan because he did not receive the lead, Jack, in the
 8 show.
 9 Q. Do you know why people believed that that
 10 was the reason they were speaking out?
 11 A. I feel like it was just because Jordan
 12 specifically like had started voicing his concerns before
 13 the other two joined in, and so I feel like people were
 14 just picking on him. I -- yeah.
 15 Q. Did you witness, after rehearsal, any
 16 interaction between Jordan and Mrs. Lyons or any other
 17 teacher?
 18 A. Yes. He had come into the auditorium
 19 like after rehearsal was over and the School Board
 20 meeting was completely finished, and I saw him talking to
 21 Mrs. Lyons and Ms. Hartenstine. I don't know what they
 22 were talking about, but Jared Mazeika was also standing
 23 there. And I had seen Jordan and Jared hug, and I didn't
 24 know what it meant at the time, but then I left
 25 rehearsal.

20

8 of 17 sheets

1 Q. Did Jordan speak to the rehearsal -- to
2 the students in rehearsal?
3 A. No.
4 Q. You don't remember any conversation that
5 he had with everyone?
6 A. No.
7 Q. What about Jared?
8 A. I don't believe Jared did either. He
9 did not attend the School Board meeting. He stayed at
10 rehearsal.
11 Q. The following day did you hear anything
12 about Jordan being suspended?
13 A. No.
14 Q. Did you attend -- there was a -- Dr.
15 Shank called everyone down to the auditorium for a Drama
16 Club meeting. Do you recall that?
17 A. Yes.
18 Q. Did you attend that?
19 A. I did.
20 Q. Do you remember what was said at that
21 meeting?
22 A. Dr. Shank had said that we're just going
23 to continue on with the production and that Stacy is
24 going to stay, and that if anyone feels like they don't
25 want to continue on with Mrs. Lyons' direction that they

21

1 can leave the show.
2 Q. Do you remember anything else that was
3 said at that meeting?
4 A. I know Haley did get up and leave. She
5 quit the show.
6 Q. How do you know she quit the show?
7 A. She had gotten up and Dr. Shank
8 addressed her and said, are you going to leave, and she
9 said, yes, I quit, and she walked out and threw her
10 binder in the trash.
11 Q. After the show was over I understand
12 there was a -- I'm sorry, let me back up. Did you hear
13 that Haley was suspended later?
14 A. I did not know she was suspended until
15 she told me.
16 Q. Okay. There was a cast and crew after-
17 party.
18 A. Yes.
19 Q. Tell me about what happened that night.
20 A. We gave Senior speeches. All the
21 Seniors lined up along the edge of the stage, and we just
22 went down the line and said where we're going, you know,
23 what we're going to do and then like whatever else we
24 wanted to.
25 Jared made very negative comments that

22

1 night during his Senior speech, saying that you shouldn't
2 let toxic people ruin your life and cut out toxic people.
3 And I'm sure the entire cast, including
4 myself, knew exactly who he was talking about, Jordan,
5 Haley, Vinny. And he also -- Vinny had gotten up during
6 Jared's Senior speech because he wanted to go check his
7 phone because it was getting quite late at night, and he
8 wanted to see if his mom texted him, and Jared got upset
9 by that. I'm not sure why.
10 And then as soon as Vinny came and sat
11 back down Jared said, bitches be bitches, and continued
12 on with his speech. And Stacy and Ms. Hartenstine did
13 not say a word about it, never addressed him afterwards.
14 They just let him say what he wanted to, and we went on
15 with the night.
16 Q. Could you tell if they were listening at
17 that point?
18 A. They definitely were. They were right
19 behind all the Seniors lined up on stage, sorting bags
20 and whatnot.
21 Q. Do you know Cassidy Kauffman?
22 A. Yes.
23 Q. And what was her reaction to all of this?
24 A. She had started crying. She was clearly
25 upset by the fact that Jared was saying things like that.

23

1 And eventually she had gone out in the hallway with Lily
2 Glick, and she was just trying to calm down and try not
3 to be super noticeable that she was upset because she was
4 just trying to like have a good night and not like start
5 any more drama.
6 But she did go out in the hallway
7 eventually, and she did come back in and she seemed
8 calmed down, but she was upset.
9 Q. Did Mrs. Lyons go out with her outside?
10 A. No.
11 Q. Did you see Mrs. Lyons speak to her
12 before she left?
13 A. No.
14 Q. Would you say that she didn't or you just
15 didn't see, one way or another?
16 A. I didn't see her talk to her before she
17 left. I did see Cassidy sitting at the tables that were
18 on the ground in the auditorium. And then I'm almost
19 positive I recall her getting up and just walking out
20 with Lily into the hallway because she was upset.
21 Q. Was Grace Bertin present that night?
22 A. Yes.
23 Q. The final play was held on April 13th of
24 this year. Does that sound right?
25 A. Yes.

24

1 Q. So this would have been April 14th when
2 this was happening, the early morning of April 14th?

3 A. Yeah.

4 Q. At any point did Mrs. Lyons make
5 statements to Vinny?

6 A. Yes. We receive a bag of like goodies
7 that our parents gave us and a paper, and most of the
8 time Mrs. Lyons will call the people up on stage and
9 she'll say nice things about them.

10 When it got to Vinny's bag and paper, she
11 had said that she was glad that he finished out the show
12 and that he stuck it through, but she said that she will
13 never forgive him for the things he said about her, and
14 she just kind of handed him his bag and let him walk off.

15 Q. Did Mrs. Lyons say anything negative to
16 any other student that night in public?

17 A. No. She did say -- it wasn't very
18 negative what she said to me, but I could tell it was
19 because I was a part of this. She did say, now promise
20 me that you'll be willing to opinion and suggestion in
21 the future, and I was --

22 Q. Willing to opinion -- you mean like to
23 give your opinion?

24 A. Yeah. I guess to like receive opinions,
25 receive suggestions. I was kind of confused why.

25

1 Q. What did you understand her to be saying?

2 A. I think she was just trying to say like
3 -- I felt like she was trying to say maybe don't always
4 follow the people who you think are right or like who are
5 just your friends. I was kind of confused why she had
6 said that to me. And everything else she said to me was
7 positive.

8 Q. I want to go back to the School Board
9 meeting. You sent a note rather than going yourself.

10 A. Yes.

11 Q. Why was that? I don't know that we ever
12 got to that.

13 A. I was concerned that she would start
14 treating me much more differently like she started
15 treating Vinny, Haley, Jordan after they went, and I knew
16 she would add me into that.

17 Q. So back to that night with the after-
18 party. The Seniors, when they deliver their speeches,
19 this is on stage?

20 A. Yes.

21 Q. And the happy papers and the other stuff,
22 that was on stage, as well?

23 A. Yes.

24 Q. And everybody else was listening?

25 A. Yep.

26

1 Q. Were all the students listening at that
2 point, or did some kind of break off and do their own
3 thing?

4 A. No. Everyone was, for the most part,
5 paying attention. As I could tell, everyone was paying
6 attention, watching, listening.

7 Q. Did anyone, Ms. Hartenstine, Mrs. Lyons,
8 Mr. Becker, Dr. Shank, any other teacher speak to you
9 about the speeches that night or about what you heard?

10 A. No.

11 Q. Do you remember anything about what was
12 put in the program by any of the Seniors?

13 A. Yes. Jared had also put a small
14 paragraph about toxic people and not letting them ruin
15 your life and not letting them walk all over you and make
16 things bad for you.

17 Q. Did you have any discussions with any
18 other students about that or what it meant?

19 A. I had just shown it to -- actually,
20 Vinny was the one who showed me that. He put it in the
21 program, and Vinny was very upset by the fact that that
22 was in there and that Mrs. Lyons did not tell him that he
23 can't do that 'cause she is the one who also looks over
24 the program and makes sure it's correct and that all the
25 ads are in there. And he was upset, and as soon as he

27

1 showed me I was also upset by that.

2 Q. Why were you upset?

3 A. I was upset because I didn't understand
4 why she would just let him put such negative things in a
5 program that's going to go out to everyone who sees the
6 show. I was just confused and upset by that.

7 Q. Have you ever known Jordan Eck to be
8 violent?

9 A. No.

10 Q. Have you ever known Haley Hartline to be
11 violent?

12 A. No.

13 Q. Have you ever known Vinny Ferrizzi to be
14 violent?

15 A. No.

16 Q. It's not the next day, but you all went
17 home after the after-party and slept and came back for
18 set strike. Is that right?

19 A. Yes.

20 Q. You were present that day?

21 A. Yes.

22 Q. Do you remember what time you arrived?

23 A. I believe that that began around 12.

24 I'm -- I believe so.

25 Q. Do you remember if you arrived on time

28

1 whenever it began?

2 A. Yes. I was always on time or a little
3 early for rehearsals, practices, whatever it was.

4 Q. Do you remember if Vinny was there?

5 A. Vinny was there at first.

6 Q. What time did he arrive, do you recall?

7 A. He was also like right on time, as well.

8 Q. How long did he stay?

9 A. We were both there on time, and then she
10 had started having people go do certain tasks and, you
11 know, cleaning up and whatnot and so I went out and
12 started putting away costumes.

13 And I did not see Vinny for awhile
14 because I was putting stuff away. But I had been just
15 walking around then 'cause I was mostly done with what I
16 was doing, and I noticed he wasn't there anymore. And no
17 one -- like no one knew where he was.

18 I later found out that he was escorted
19 out by some parents that were helping take down the large
20 set that we had. They had escorted him out.

21 Q. Who told you that?

22 A. Vinny.

23 Q. And did anybody else talk about this at
24 all?

25 A. No.

29

1 Q. And how late did -- you may not remember
2 times, but how late did it go? How long were you there,
3 is what I'm really asking?

4 A. It was a couple of hours. It wasn't too
5 long, but it was a couple of hours just to make sure
6 everything was put away and cleaned up.

7 Q. Did you observe Vinny do anything unusual
8 during clean-up?

9 A. No.

10 Q. Did you see him cause any disruptions or
11 anything?

12 A. No.

13 Q. I want to go back to that meeting that
14 happened in the auditorium on March 21st after the School
15 Board meeting. You mentioned Haley getting up at the
16 end.

17 A. Yes.

18 Q. Did you notice her disrupting the meeting
19 before that time?

20 A. No. She was sitting in the front paying
21 attention and listening.

22 Q. You've known Jared for awhile?

23 A. Yes.

24 Q. I think you said you went to elementary
25 school with him?

30

1 A. Yes.

2 Q. So over the years you've probably eaten
3 in the cafeteria with him and so forth?

4 A. Yes.

5 Q. Are you aware of any of his food
6 allergies?

7 A. Yes. He is allergic to apples, I
8 believe. That's about the only one that I know because
9 people would -- like our friends would tease him about
10 it. They would never do anything to him to like harm
11 him, but they would just tease him about it.

12 Q. How would they tease him?

13 A. They'd just be like, oh, I'm going to
14 give you an apple or something and like little, silly
15 stuff, but they would never actually do it and harm him.

16 Q. Did he ever express to you concern about
17 that?

18 A. No.

19 Q. Do you know how allergic he is to this?

20 A. I'm not sure.

21 Q. I'm going show you a video. I'm almost
22 done.

(Video was shown.)

23 Q. Have you ever seen this video before?

24 A. Yes.

31

1 Q. Where did you see it?

2 A. Haley and Jordan showed me.

3 Q. Did they tell you what the video was
4 about?

5 A. They were just -- Haley was over at
6 Jordan's house, and he was just making funny puns because
7 they're a couple, so he was just making puns about like
8 loving her and whatnot. They said it was literally
9 nothing more than that.

10 Q. Okay.

11 A. Yeah.

12 Q. You heard, perhaps, later that this was a
13 threat. Is that right?

14 A. Yes.

15 Q. Who told you that?

16 A. They had told me that Jared felt that it
17 was a threat.

18 Q. Did you hear that from Jared or anyone
19 else?

20 A. No.

21 Q. Do you believe that this video was a
22 threat towards Jared?

23 A. Absolutely not.

24 Q. Why are you so confident?

25 A. Because I know them. I know Haley and

32

1 Jordan, and I know they're in like a pretty serious,
 2 like, loving relationship. And they make jokes
 3 constantly and not about him but just like to each other,
 4 and they just like to be funny and silly because that's
 5 just the kind of people they are.
 6 Q. Do they like puns?
 7 A. Yes.
 8 Q. You understand you're under oath here
 9 today?
 10 A. Yes.
 11 Q. That it's very serious that you tell the
 12 truth?
 13 A. Yes.
 14 Q. Do you stand by everything you've said?
 15 A. Yes.
 16 MR. READY: Okay. I have nothing
 17 further.
 18 BY MS. O'DONNELL:
 19 Q. I just have a couple of follow-ups.
 20 Other than yourself sending a letter to the Board and
 21 Jordan, do you know anyone else who spoke to the Board
 22 during that meeting?
 23 A. I do believe that Haley and Vinny also
 24 spoke at the School Board meeting.
 25 Q. So Haley, Jordan, Vinny and yourself. Do

33

1 you know if anyone else did?
 2 A. Mrs. Eck read my letter for me.
 3 Q. Anyone else that you can recall?
 4 A. I do not recall.
 5 Q. Do you know if anyone got suspended or
 6 otherwise disciplined or punished for speaking out?
 7 A. I do know Jordan was removed from the
 8 show, but I did not find that out until later when he had
 9 told me.
 10 Q. Was it because he spoke out at the Board
 11 meeting?
 12 A. Yes.
 13 Q. How do you know that?
 14 A. He had told me that that was mostly the
 15 reason, and that people -- that Mrs. Lyons was feeling
 16 that he was threatening the show and the program.
 17 Q. Did you hear that from anyone other than
 18 Jordan?
 19 A. No.
 20 Q. So all your information came from Jordan
 21 himself?
 22 A. Yes.
 23 MS. O'DONNELL: All right. That's all
 24 the questions I have. Thank you.
 25 THE WITNESS: Yeah.

34

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1 MR. READY: All right. Thank you.
 2 THE WITNESS: Thank you.
 3 (Whereupon, the deposition concluded at
 4 2:20 o'clock p.m.)
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CERTIFICATE

1
 2
 3 I, Lori A. Dilks, the officer before whom
 4 the deposition of HALEY RICHARD was taken, do hereby
 5 certify that HALEY RICHARD, the witness whose testimony
 6 appears in the foregoing deposition, was duly sworn by me
 7 on November 14, 2019, and that the transcribed deposition
 8 of said witness is a true record of the testimony given
 9 by her; that the proceedings are herein recorded fully
 10 and accurately to the best of my ability; that I am
 11 neither attorney nor counsel for, nor related to any of
 12 the parties to the action in which this deposition was
 13 taken; and, further, that I am not a relative of any
 14 attorney or counsel employed by the parties hereto or
 15 financially interested in this action.

16
 17
 18 Lori Dilks
 19 Lori A. Dilks

20

21 PA Court Reporter
 22 Notary Public in and for the Commonwealth of Pennsylvania

23

24 My Commission expires
 25 November 29, 2023

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